

MULLANEY

8/16/2017

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
CASE NO. 16-13607(SMB)

IN RE:

WONDERWORK, INC.,
Debtor.

INTERVIEW of BRIAN MULLANEY

VOLUME I

August 16, 2017

New York, New York

Reported by: Arielle Santos
Job No. 19384

1 INTERVIEW of BRIAN MULLANEY, before S.
 2 Arielle Santos, Registered Professional Reporter,
 3 Certified Shorthand Reporter, Certified LiveNote
 4 Reporter and Notary Public, taken at the offices
 5 of Loeb & Loeb, 345 Park Avenue, New York, NY
 6 on Wednesday August 16, 2017, at 1:00 p.m.

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 21 BY - JASON LILIEN

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1 BRIAN MULLANEY - VOLUME I
 2 BRIAN MULLANEY, One Sumner Lane,
 3 Belmont, Massachusetts, interviewed as
 4 follows:

INTERVIEW

BY MR. CURCHACK:

8 Q Good afternoon. My name is
 9 Walter Curchack. I represent Jason
 10 Lilien, who is with us in the room
 11 today. Jason is the court-appointed
 12 examiner, as you know, for WonderWork,
 13 Inc.

14 I will be asking you a
 15 series of questions. The reporter
 16 will be taking down your answers.

17 While this interview is not
 18 under oath, we do, of course, expect
 19 you to tell the truth.

20 Do you understand that?

21 A Yes.

22 Q Because the reporter is
 23 taking notes, please make your answers
 24 verbal. No nodding, things like that,
 25 so she can get it down.

1 BRIAN MULLANEY - VOLUME I
 2 hesitate to ask me to restate it or
 3 clarify something.

4 A Sure.

5 Q At some time, if you -- if
 6 something comes to your mind, if you
 7 want to revise your answer, you think
 8 of something you didn't remember
 9 before, just say so and we will put it
 10 on the record.

11 A Okay.

12 Q We will be taking breaks,
 13 but before I need one, if you need
 14 one, just ask, and when we get to a
 15 convenient stopping point, we will do
 16 that.

17 A Thank you.

18 Q Could you please state your
 19 full name and address for the record,
 20 please.

21 A Brian Mullaney, One Sumner
 22 Lane, Belmont, Massachusetts.

23 Q Are you feeling okay today?

24 A Yeah, I feel great.

25 Q Did you prepare for this

BRIAN MULLANEY - VOLUME I

1 A Sure.

2 Q And also with me today is my
 3 colleague Bethany Simmons and Mr.
 4 Lilien is noted and Gary Polkowitz,
 5 who is the firm Goldin Associates, and
 6 with you is Len Trivigno from Carter
 7 Ledyard.

8 I am going to be asking you
 9 most of the questions today, but
 10 because of the informal nature of
 11 this, Jason will have questions, I am
 12 sure, from time to time, and there are
 13 a couple of financial things where
 14 Gary may ask, but not like a usual
 15 deposition.

16 A Sure.

17 Q I just want to alert you to
 18 that so you understand.

19 A Sure.

20 Q A couple of other
 21 housekeeping matters. Please wait for
 22 me to finish asking the question
 23 before you answer. At some point you
 24 don't understand the question, don't

1 BRIAN MULLANEY - VOLUME I
 2 interview with anybody?

3 A I sat with Len for an hour
 4 to talk about what to expect, and
 5 that's about it.

6 Q Okay.

7 Did you discuss with any of
 8 the other WonderWork employees who we
 9 have spoken to what we discussed with
 10 them?

11 A Not in detail. I saw Hana
 12 today and asked her how it went and I
 13 saw Karen Lazarus and asked her how it
 14 went and I haven't talked to anyone
 15 else.

16 Q Did you review any documents
 17 in preparation for today?

18 A No.

19 Q Okay.

20 Could you please tell us
 21 about your education.

22 A Sure. I went to Belmont
 23 Hill School in Boston for high school,
 24 and then I went to Harvard College and
 25 graduated with a degree in business

1 BRIAN MULLANEY - VOLUME I
 2 economics in 1983.
 3 Q Okay.
 4 What did you major --
 5 business economics, you said.
 6 Did you do any graduate
 7 work?
 8 A No.
 9 Q Have you ever taken any
 10 postcollege professional
 11 certifications or --
 12 A No.
 13 Q -- continuing education?
 14 A No. It took me six years to
 15 get my four-year degree, so that was
 16 enough.
 17 Q And what was your first job
 18 after graduating from college?
 19 A I came to Manhattan and
 20 worked for Young & Rubicam
 21 Advertising.
 22 Q And what did you do there?
 23 A I was a copy trainee.
 24 Q What does that mean?
 25 A It means I was a creative --

1 BRIAN MULLANEY - VOLUME I
 2 for any non-profits during that
 3 period?
 4 A I did some work for
 5 United -- you mean through J. Walter
 6 Thompson?
 7 Q Yes.
 8 A Because --
 9 Q Let's start professionally.
 10 A Yeah.
 11 Q Clients, non-profit?
 12 A Yeah, at Young & Rubicam, I
 13 did some work for the United Way, for
 14 the internal fundraising at Y&R. When
 15 I was at J. Walter Thompson, I
 16 volunteered and did work for the
 17 Andrew Glover Foundation down on the
 18 Lower Eastside. It's an alternative
 19 sentencing program. And did work for
 20 Church of Our Savior. It's a church
 21 on Park Avenue and 39th Street.
 22 Q What was the nature of that
 23 work?
 24 A You are going up to J.
 25 Walter?

1 BRIAN MULLANEY - VOLUME I
 2 I was a writer, and I learned how to
 3 write, print ads and TV commercials
 4 and jingles and all that. Worked my
 5 way up.
 6 Q Okay.
 7 How far did you get as you
 8 worked your way up?
 9 A I got from '83 as a copy
 10 trainee to a senior vice president at
 11 J. Walter Thompson in -- six years
 12 later, 1989, creative director.
 13 Q Was that a change of firms?
 14 A Yeah, from Y&R to J. Walter
 15 Thompson, yes.
 16 Q And how long were you at J.
 17 Walter Thompson?
 18 A Five years.
 19 Q What were your
 20 responsibilities while you were there?
 21 A I created advertising for
 22 large brands like Miller Beer and
 23 Burger King and Computer Associates,
 24 Kodak.
 25 Q Any -- did you do any work

1 BRIAN MULLANEY - VOLUME I
 2 Q Yes.
 3 A Well, I did brochures or
 4 helped marketing or fundraising ideas
 5 to help them raise money, non-profit.
 6 Q Was this pro bono work by
 7 J.W. or was this -- were they paying
 8 the firm?
 9 A No, it was separate. It was
 10 just on my own.
 11 Q So through your professional
 12 responsibilities, did you ever have
 13 any clients who were non-profits?
 14 A No.
 15 Q Okay.
 16 So at J.W. Thompson, you
 17 stayed there about five years and then
 18 where did you go?
 19 A I started my own tech ad
 20 agency in my apartment with my life
 21 savings in January 1990, at the
 22 beginning of the recession and Desert
 23 Storm.
 24 Q What do you mean by tech
 25 advertising?

1 BRIAN MULLANEY - VOLUME I
 2 A Well, in 1988, I never used
 3 a computer before, but we pitched the
 4 Computer Associates account out in
 5 Long Island and won it and I learned
 6 all about computers and met Michael
 7 Dell and Bill Gates, and I saw the
 8 beginning of the tech thing.

9 I said wow. And at J.
 10 Walter, I couldn't get anyone to work
 11 on the computer account. At that
 12 time, believe it or not, at J. Walter
 13 Thompson, my boss was James Patterson,
 14 and there was one Mac in all of J.
 15 Walter Thompson and no one saw it, so
 16 I said I am going to quit and start an
 17 ad agency in my apartment with two
 18 Dell computers and an account
 19 executive came with me.

20 Q And who was that?

21 A That was Frances McDonald
 22 was her name.

23 Q And what was the name of
 24 the --

25 A My firm was called Schell

1 BRIAN MULLANEY - VOLUME I
 2 Microsystems, which was a chip company
 3 out in Long Island as well. We worked
 4 for Ziff Davis. But the idea was all
 5 tech stuff because no one at general
 6 ad agencies knew or could talk to the
 7 engineers and understand what was
 8 going on.

9 You understand this is
 10 before e-mail and this is before
 11 networking and this is before the
 12 Internet.

13 Q So tell me what it was that
 14 you were doing as a tech agency that
 15 the other firms weren't.

16 A Oh, we were a big name
 17 talent that had worked and won Clios
 18 for the biggest brands in America, and
 19 we were learning about computers and
 20 we could talk to engineers and do an
 21 ad for the computer world for a
 22 mainframe, for a database or financial
 23 software or any of that. So we
 24 specialized in it.

25 So that's why the clients

1 BRIAN MULLANEY - VOLUME I
 2 Mullaney. My partner was Mike Schell,
 3 who was an art director, and I was the
 4 writer.

5 Q So who were your clients?

6 A Well, I starved for like
 7 three or four months, thinking it was
 8 the biggest mistake of my life, as my
 9 parents pointed out, and then we
 10 pitched and won the Computer
 11 Associates account, which was a huge
 12 account.

13 That -- how you run at J.
 14 Walter Thompson -- and they fired
 15 Thompson and came with us. And so we
 16 started to handle them domestically,
 17 and then they loved the work we did
 18 and then they had us fire every ad
 19 agency in the world and we opened an
 20 office in Paris and we handled all
 21 their work.

22 From there we picked up the
 23 Wall Street Journal. We launched the
 24 first digital version of that in '96
 25 or so. We worked for Standard

1 BRIAN MULLANEY - VOLUME I
 2 liked us and we could then take a very
 3 boring engineer and do an ad in
 4 computer world that would score two or
 5 three times as well as the other ads,
 6 which were done by engineers.

7 Q So you were basically using
 8 your knowledge of the technology to
 9 create the advertising for a tech
 10 company selling technology?

11 A Yeah, it was more like up
 12 until us, most of the ad agencies were
 13 run by engineers, very boring stuff.
 14 We were guys that had done
 15 million-dollar commercials and my
 16 partner won Lions at the Cannes Film
 17 Festival. We brought that talent to a
 18 very nerdy group. This was before
 19 tech was hip and the Silicon Valley TV
 20 show.

21 Q Was the advertising you were
 22 doing tech?

23 A Yes.

24 Q Technical in any kind of
 25 way?

1 BRIAN MULLANEY - VOLUME I
 2 A Yes, because the products --
 3 we were selling software. We were
 4 selling chips. We were selling
 5 database.

6 Q I understand.

7 That's what you were
 8 advertising, were technology products,
 9 but your place -- was the advertising
 10 medium any different than it would
 11 have been if you were selling beer or
 12 cigarettes?

13 A Yes, in that it was a B2B,
 14 business-to-business, primarily print.
 15 We did a little TV at the end, but it
 16 was mostly B2B.

17 Q Okay.

18 But it was still print
 19 primarily as opposed to --

20 A Yeah, this was before the
 21 Internet. It was mostly print and
 22 then we branched out and started doing
 23 direct mail and we did trade shows --
 24 B2B tech trade shows.

25 We kind of morphed into

1 BRIAN MULLANEY - VOLUME I
 2 can I jump ahead to that or --
 3 Q How long did you have
 4 your --

5 A I didn't learn about direct
 6 mail at Schell Mullaney.

7 MR. LILIEN: When you say
 8 "direct mail," what are you
 9 referring to? What would you send
 10 out?

11 THE WITNESS: Well, direct
 12 mail --

13 MR. LILIEN: The B2B.

14 THE WITNESS: We would send
 15 letters to the CEO of every
 16 high-tech company there was or we
 17 would send letters to, you know,
 18 titles at tech companies.

19 MR. LILIEN: What was the
 20 content of the letters?

21 THE WITNESS: I sent a box
 22 with, you know, the boss style you
 23 could rip the head off of. We had
 24 to send one of those to Johnny,
 25 the chairman of IBM. So that was

1 BRIAN MULLANEY - VOLUME I
 2 doing all the marketing things they
 3 would need, product conception, naming
 4 products, branding them, package
 5 design. I wrote the speeches for the
 6 chairman, stuff like that. Just about
 7 everything we could do.

8 Q Okay. You mentioned direct
 9 mail.

10 Was this the first time you
 11 started working with direct mail?

12 A Yes, but it was very
 13 different direct mail than what I did
 14 later on because it was B2B direct
 15 mail, so it's a very different animal,
 16 but yes.

17 Q And how did you learn about
 18 how to do that?

19 A Well, I really learned about
 20 direct mail at Smile Train because I
 21 knew nothing about consumer direct
 22 mail and we learned by doing and then
 23 we had a really good vendor who taught
 24 me a lot.

25 So the first letter -- so

1 BRIAN MULLANEY - VOLUME I
 2 a very expensive piece. Anything
 3 from that to a bowling ball, a
 4 ball and chain that had IBM
 5 printed on it and it said is this
 6 how you feel about your database
 7 vendor, so creative things to
 8 boring letters and brochures,
 9 things like that.

10 MR. LILIEN: The purpose of
 11 a letter was what?

12 THE WITNESS: To get a lead,
 13 to get a meeting, to get -- you
 14 know, call us, to get a salesman
 15 in the door to sell the product.

16 MR. LILIEN: Okay.

17 BY MR. CURCHACK:

18 Q Would you be involved in the
 19 sales process?

20 A No.

21 Q So these letters actually
 22 came from your client?

23 A Yes. Yep.

24 Q So how long were you running
 25 this agency?

1 BRIAN MULLANEY - VOLUME I
 2 A Ten years.
 3 Q So that takes us to about --
 4 A 1999.
 5 Q And what happened next?
 6 A Well, I was really
 7 fortunate. I sold my agency in 1996,
 8 and I only had to run it for two or
 9 three years, which I did.
 10 Q Who did you sell it to?
 11 A I sold it to CKS
 12 Interactive, which was the first kind
 13 of tech agency that Goldman Sachs took
 14 public. We were there for the
 15 acquisition. They had 140 employees.
 16 That was in '96. In 1999, they had
 17 10,000 employees.
 18 MR. LILIEN: Who owned CKS
 19 at the time?
 20 THE WITNESS: They are
 21 publicly traded because Goldman
 22 took them public.
 23 MR. LILIEN: They took them
 24 public before your sale?
 25 THE WITNESS: Yes.

1 BRIAN MULLANEY - VOLUME I
 2 MR. LILIEN: Got it.
 3 THE WITNESS: They raised
 4 the money to go buy -- do the
 5 roll-ups. They went and bought 70
 6 firms. Then they crescendoed with
 7 10,000 employees and one billion
 8 in sales and they were the biggest
 9 bankruptcy of the TechReg in
 10 April 2000.
 11 We had luckily sold all our
 12 stock, but we bought back selected
 13 assets a year before and kept
 14 operating on our own.
 15 BY MR. CURCHACK:
 16 Q So in other words -- well,
 17 during that period, from 1996 to 1999,
 18 you were under contract to CKS as part
 19 of the sale?
 20 A Yes. Yes.
 21 Q And then when they went
 22 bankrupt, you bought back some --
 23 A No, before -- before -- six
 24 months before.
 25 Q Okay.

1 BRIAN MULLANEY - VOLUME I
 2 And --
 3 A I got a call from a lawyer
 4 that said would you like to buy back
 5 some selected assets. I said, sure.
 6 He goes, well, you have to do it by
 7 next Friday. I said that sounds good
 8 to me.
 9 Q Okay.
 10 So were you still employed
 11 at the time by them?
 12 A Well, yeah, I was buying my
 13 freedom back from them.
 14 Q Okay.
 15 So in connection with buying
 16 the assets --
 17 A I was one of the assets I
 18 buying back.
 19 Q Your employment terminated.
 20 Okay.
 21 You went back to running
 22 your own agency --
 23 A Yeah.
 24 Q -- for some period of time?
 25 A Yes.

1 BRIAN MULLANEY - VOLUME I
 2 Q For how long?
 3 A The overlay of this is --
 4 when I had my own agency, I did a lot
 5 of charity work as well. And in
 6 '92 -- in '93, I started at charity
 7 called Operation Smile in New York
 8 City to provide cosmetic -- not
 9 cosmetic -- reconstructive children
 10 for poor children in New York City
 11 public schools.
 12 And we started work with the
 13 public school system to identify the
 14 kids. Then I lined up all the major
 15 hospitals in New York who agreed to
 16 provide free surgery.
 17 Q And what drew you to that
 18 cause?
 19 A Well, I was riding the
 20 subway in '88, 89, when I was
 21 completely broke, up Park Avenue
 22 because I was doing freelance work for
 23 cosmetic surgeons that were making
 24 millions and millions of dollars.
 25 I rode the subway up there.

1 BRIAN MULLANEY - VOLUME I
 2 I learned a lot about cosmetic
 3 surgery. I would see kids when school
 4 got out that had giant hairy nevuses
 5 or hemangiomas or six fingers or no
 6 ears.

7 So I went to those doctors
 8 and said if I find kids, would you
 9 help them for free, and I started it
 10 that way.

11 MR. LILIEN: I'm sorry, what
 12 were you doing for plastic
 13 surgery?

14 THE WITNESS: I was doing
 15 marketing for them. I was doing
 16 newspaper ads and TV commercials.

17 BY MR. CURCHACK:

18 Q So --

19 A I was unmarried and I was a
 20 yuppie and I was very fortunate. I
 21 wanted to do charity work. So I went
 22 to Koch's Office of Volunteerism down
 23 near City Hall and I had this nice
 24 little old lady who said what do you
 25 want to do. I said I travel a lot,

1 BRIAN MULLANEY - VOLUME I
 2 idea, meet with so and so. I
 3 started traveling to Brooklyn to
 4 have these meetings.

5 And the idea was free
 6 surgery for kids who were mostly
 7 immigrants or really poor who were
 8 disfigured. So it took us two
 9 years to get approval from the
 10 bureaucracy there. At the very
 11 last minute, they wanted me to
 12 sign personally that if anything
 13 happened to a kid I would lose all
 14 my assets and my house.

15 So I told the lawyer at the
 16 board of education, I was going to
 17 call the New York Post. She said,
 18 okay, you don't need to do that.
 19 We started in 79 schools and grew
 20 to 500 schools and grew to all
 21 1200 schools and we found hundreds
 22 and hundreds of kids with
 23 problems.

24 MR. LILIEN: So where in the
 25 timeline of this is relative to

1 BRIAN MULLANEY - VOLUME I
 2 so -- but I would like to work with
 3 some black kids who don't have a
 4 father or the boys' and girls' club,
 5 something like that, because I was a
 6 jock.

7 She said you want to do
 8 that? That will be horrible. She
 9 goes you went to Harvard. She goes I
 10 have these Japanese business men that
 11 need to learn English and I want you
 12 to volunteer to do that.

13 I stormed out of there and
 14 said I am going to start my own
 15 charity and I am going to help these
 16 kids on the subway, so that was the
 17 genesis of that.

18 MR. LILIEN: When you say
 19 you started your own charity, what
 20 does that mean?

21 THE WITNESS: I wrote to
 22 Chancellor Fernandez. He was the
 23 chancellor of all the public city
 24 schools, and told him my idea, and
 25 he wrote back, this is a great

1 BRIAN MULLANEY - VOLUME I
 2 where you were forming your new
 3 company?

4 THE WITNESS: When I had my
 5 new company, so '92, '93.

6 MR. LILIEN: So you're
 7 running your advertising agency?

8 THE WITNESS: Yeah.

9 MR. LILIEN: Marketing
 10 company?

11 THE WITNESS: Yeah.

12 MR. LILIEN: And the same
 13 time forming charity?

14 THE WITNESS: Yeah, I was
 15 financing the charity work,
 16 whatever expenses there were from
 17 my new company.

18 MR. LILIEN: I see.

19 THE WITNESS: But there
 20 weren't that many expenses.

21 MR. LILIEN: The role you
 22 were playing -- what was the
 23 official role in the charity?

24 THE WITNESS: Well, the
 25 lawyer that helped me sell my

1 BRIAN MULLANEY - VOLUME I
 2 company of Jones Day, he
 3 incorporated us and registered the
 4 name and we weren't doing
 5 fundraising because I was
 6 financing it. So we really had to
 7 make it work.

8 MR. LILIEN: What position
 9 did you have at the time when you
 10 were forming it?

11 THE WITNESS: I don't know.
 12 President or CEO. There wasn't
 13 much there. It was me and my
 14 partner. And then we hired a
 15 woman to kind of run it for us, I
 16 believe, for like 30 grand a year.

17 BY MR. CURCHACK:

18 Q So this Operation Smile was,
 19 at that point -- by "that point," I
 20 mean when it's being formed in early
 21 1990s -- was not raising any funds.

22 You were just connecting
 23 people in need with people willing to
 24 perform the service?

25 A Yes. We were like a Uber

1 BRIAN MULLANEY - VOLUME I
 2 THE WITNESS: At
 3 Operation Smile, the two founders,
 4 the people who started it, Bill
 5 Magee and Kathy Magee.

6 BY MR. CURCHACK:

7 Q Now, did the organization
 8 that you were setting up in New York
 9 with Jones Day --

10 A Yeah.

11 Q -- organized for you, did
 12 that have a name?

13 A Yeah, it was
 14 Operation Smile.

15 Q I'm sorry, I thought that
 16 was the name of the people in --

17 A Yes.

18 Q It was the same --

19 A They never registered in New
 20 York, so we registered it.

21 Q So it was a coincidence that
 22 the names were the same?

23 A It was a coincidence, yes.

24 MR. LILIEN: How long did
 25 the organization last; '92 to '95,

1 BRIAN MULLANEY - VOLUME I
 2 platform. Then in '94 and '95, I
 3 opened up People magazine and on the
 4 cover is another charity called
 5 Operation Smile, and that is in
 6 Virginia, and I never heard of them.

7 They had bad lawyers because
 8 they weren't registered in New York.
 9 I wrote to them. I flew down and met
 10 them, the founder. Very charismatic
 11 guy. And his wife, the co-founders.
 12 They were much bigger than us. They
 13 helped kids overseas.

14 I said my program is to help
 15 Inner city kids. As successful as it
 16 is in New York, we want to take it to
 17 Chicago, Detroit and large urban
 18 areas. They said why don't we merge
 19 together and we did. We merged. Then
 20 I went on their board of directors
 21 around '94, '95, and I started going
 22 on missions around the world.

23 MR. LILIEN: Who did you
 24 meet with at the time? Do you
 25 recall?

1 BRIAN MULLANEY - VOLUME I
 2 your organization?

3 THE WITNESS: Yes. When I
 4 went on the board, I turned over
 5 all my operations to them and then
 6 they -- the 501(c)(3) stuff was
 7 never closed out, and when I
 8 started Smile Train years later,
 9 the same Jones Day lawyer
 10 Rob Smith used that and we brought
 11 it back to life, as bizarre as
 12 that sounds.

13 MR. LILIEN: Let me make
 14 sure I understand this.

15 The (c)(3) organization was
 16 formed in '92; received tax exempt
 17 status as a (c)(3) organization.

18 THE WITNESS: Yeah.

19 MR. LILIEN: In 1995 you
 20 merged with the Virginia
 21 Operation Smile?

22 THE WITNESS: Right. Right.

23 MR. LILIEN: But it wasn't a
 24 formal merger?

25 THE WITNESS: It was a

1 BRIAN MULLANEY - VOLUME I
 2 formal merger. The board approved
 3 it.
 4 MR. LILIEN: The corporation
 5 that existed in New York --
 6 THE WITNESS: Yeah, it was
 7 never snuffed out. It was never
 8 closed.
 9 MR. TRIVIGNO: Let him
 10 finish.
 11 MR. LILIEN: Was it formally
 12 merged into the Virginia entity
 13 such that the New York corporation
 14 no longer was in existence, or did
 15 it remain in existence in New
 16 York?
 17 THE WITNESS: Unbeknownst to
 18 me, it remained in existence.
 19 MR. LILIEN: So when -- when
 20 you were merging, what did you
 21 think was happening at the time?
 22 THE WITNESS: Oh, I went on
 23 their board and started raising
 24 money for them and traveling and I
 25 didn't spend a second doing my own

1 BRIAN MULLANEY - VOLUME I
 2 Johnson & Johnson.
 3 He was our honoree. We
 4 raised \$1.2 million. So I raised
 5 money, traveled around the world, got
 6 very involved, and then I sold my
 7 agency, which gave me more time to do
 8 this and I loved it. It was like a
 9 labor of love. So I did that and it
 10 was a life-changing experience. But
 11 every mission I would go on, 400 kids
 12 would show up and you turn away 300
 13 because the mission is a two-week
 14 medical mission and you can only
 15 operate on 100 kids.
 16 MR. LILIEN: Why could you
 17 only operate on 100 kids?
 18 THE WITNESS: They only had
 19 so much time, so much surgeons, so
 20 many beds. They posed a list of
 21 100 kids. And someone has to tell
 22 300 mothers their kid was not
 23 getting surgery. It was horrific.
 24 I watched that for years. And I
 25 kept telling Bill Magee, the

1 BRIAN MULLANEY - VOLUME I
 2 stuff at all.
 3 MR. LILIEN: Just moving
 4 forward now to Smile Train, can
 5 you explain again -- explain what
 6 you meant by Smile Train using --
 7 where you reengaged this entity --
 8 renew this entity.
 9 THE WITNESS: Sure. So I go
 10 on the board of Smile Train, and I
 11 loved it. It was great work.
 12 BY MR. CURCHACK:
 13 Q Smile Train or
 14 Operation Smile?
 15 A Sorry, Operation Smile. I
 16 started traveling to Gaza, China and
 17 all around the world, to Vietnam, and
 18 I was -- I just loved it and started
 19 to help them raise money.
 20 When I joined them they were
 21 raising \$60,000 a year in New York,
 22 which is like nothing. I never raised
 23 money before, but I knew it was
 24 nothing. So the next year, I
 25 introduced them to the chairman at

1 BRIAN MULLANEY - VOLUME I
 2 surgery is a miracle, but your
 3 business model is horrible. He
 4 says what is a business model. I
 5 said it's so expensive. Your ROI
 6 is bad. It cost so much to ship
 7 10,000 pounds of equipment.
 8 He said what is ROI? If you
 9 throw all your numbers into a
 10 spreadsheet -- he is like what is
 11 a spreadsheet. I did that for
 12 five years, and then I finally
 13 quit to start a better charity in
 14 1998 -- around there, '98.
 15 BY MR. CURCHACK:
 16 Q That was Smile Train?
 17 A That was Smile Train. So we
 18 separated from them and we took money
 19 from them that we had raised because
 20 the Smile Train was a special project.
 21 I came up with the idea of a train
 22 while at Operation Smile that would
 23 travel around China, and the local
 24 surgeons would do the surgeries.
 25 It was very controversial at

1 BRIAN MULLANEY - VOLUME I
 2 the time because Magee was like, well,
 3 what am I going to do then. I wasn't
 4 a surgeon. I didn't care who did the
 5 surgery. But he did. So we had two
 6 years. It was a special project
 7 there.

8 There was a lot of tension
 9 because he didn't like the local
 10 surgeons operating and we did and so
 11 we separated from them around '98,
 12 '99. I formally started Smile Train
 13 then.

14 MR. LILIEN: When you did
 15 separate --

16 THE WITNESS: Yeah.

17 MR. LILIEN: -- how did that
 18 come about? How did the
 19 conversation with Mr. Magee go?

20 THE WITNESS: Well, it was
 21 horrible. There was a lot of
 22 tension because he didn't --
 23 because I raised 10 million for
 24 the Smile Train thing. He wanted
 25 that 10 million for his own

1 BRIAN MULLANEY - VOLUME I
 2 tension. And we had good people
 3 on the board, like Bob Darretta,
 4 who was the CEO of Johnson &
 5 Johnson.

6 We were trying to get the
 7 Magees to get professional
 8 management stuff, and then a
 9 horrible thing happened in August.
 10 They sent a mission to Beijing,
 11 and two kids died on the first
 12 day. And so that is the day I
 13 quit with Charles Wang. He was on
 14 the board as well.

15 BY MR. CURCHACK:

16 Q I was going to ask you, who
 17 else was on the board?

18 A Who was on the Smile Train
 19 board?

20 Q Who was on the board when
 21 you quit?

22 A When I quit, Bill Magee;
 23 Kathy Magee; Charles Wang; Ann Ziff,
 24 the chairman of Metropolitan Opera. I
 25 don't know if she was chairman then,

1 BRIAN MULLANEY - VOLUME I
 2 project.

3 He had a project called the
 4 Pope Project where he was going to
 5 bring 5,000 kids into the Vatican
 6 with clefts, disfigured, and the
 7 Pope was going to bless them and
 8 then they were going to go home
 9 and get operated on in 40
 10 countries and then come back.

11 We thought -- or I thought
 12 it was the worst idea in the
 13 world, because it's so expensive
 14 and -- for a lot of reasons. He
 15 was raising money for that. I
 16 come up with this Smile Train idea
 17 and I get 10 million like that.
 18 We get on the Today Show like
 19 that. And President George Bush
 20 takes it to the president of
 21 China, Jiang Zemin, who loved it.

22 So we were taking off. He
 23 couldn't raise any money for his
 24 Pope project. He didn't like our
 25 project. There was a lot of

1 BRIAN MULLANEY - VOLUME I
 2 but she is now. John Wren from
 3 Minneapolis.

4 I can't remember all the
 5 names, but there were like 15 people.

6 MR. LILIEN: Brian, I think
 7 you mentioned you raised 10 or
 8 \$12 million --

9 THE WITNESS: Yeah.

10 MR. LILIEN: -- for
 11 Operation -- for the Smile Train
 12 project.

13 THE WITNESS: For the
 14 Smile Train project.

15 MR. LILIEN: Where was that
 16 money accounted for? Was that on
 17 Operation Smile's --

18 THE WITNESS: Yes.

19 MR. LILIEN: -- bank?
 20 Okay.

21 THE WITNESS: Yes.

22 MR. LILIEN: And when you
 23 left Operation Smile --

24 THE WITNESS: Yes.

25 MR. LILIEN: -- you resigned

1 BRIAN MULLANEY - VOLUME I
 2 as a board member?
 3 THE WITNESS: Yes.
 4 MR. LILIEN: Did you have
 5 any other role at Operation Smile
 6 beyond board member?
 7 THE WITNESS: No.
 8 MR. LILIEN: Did you take
 9 any of that money with you --
 10 THE WITNESS: Yes.
 11 MR. LILIEN: -- to
 12 Smile Train?
 13 THE WITNESS: Yes.
 14 MR. LILIEN: How did that
 15 process work out?
 16 THE WITNESS: My Jones Day
 17 lawyer negotiated with them,
 18 because we had a big fundraiser in
 19 January 1998 at the Winter Garden
 20 down in Wall Street, and we had
 21 all these bigwigs there and we
 22 raised a lot of money and Charles
 23 Wang had given a couple of million
 24 and Bill Gates had given a million
 25 for the Smile Train project.

1 BRIAN MULLANEY - VOLUME I
 2 outrageous because -- if I could
 3 tell you what the accident was.
 4 There's a machine called the
 5 pulse oximeter. It measures the
 6 oxygen in your blood, and it makes
 7 sure you are getting oxygen. So
 8 they shipped the machine there to
 9 Beijing, but the anesthesiologist
 10 didn't plug it in because he likes
 11 to do it the old-fashion way,
 12 cowboy medicine. This kid wasn't
 13 getting any oxygen, and he died.
 14 Like, no one should ever die from
 15 a cleft surgery.
 16 MR. LILIEN: As a result,
 17 were you asked to resign as a
 18 result of the accident?
 19 THE WITNESS: No.
 20 MR. LILIEN: Did you resign
 21 as a result of the accident?
 22 THE WITNESS: Charles Wang
 23 called me and he heard it first
 24 because his people in China called
 25 him and said we are both resigning

1 BRIAN MULLANEY - VOLUME I
 2 So we arrived at a figure of
 3 4 and a half million, something
 4 like that, and that's what they
 5 gave us.
 6 MR. LILIEN: Was that
 7 memorialized in any sort of
 8 agreement?
 9 THE WITNESS: Well, it's on
 10 our 990 for starting Smile Train.
 11 I know that is the accurate
 12 number. I don't know. I wasn't
 13 running Smile Train. I was on the
 14 board, but I wasn't the CEO, so I
 15 don't know.
 16 MR. LILIEN: Okay. The
 17 accident you referred to in
 18 China --
 19 THE WITNESS: Yeah.
 20 MR. LILIEN: -- was that a
 21 Smile Train project?
 22 THE WITNESS: No, it was on
 23 the cover of The New York Times in
 24 November '99, two days in a row.
 25 It was really

1 BRIAN MULLANEY - VOLUME I
 2 today because they just killed two
 3 kids.
 4 He got a special report in
 5 Chinese that they sent to him.
 6 BY MR. CURCHACK:
 7 Q So you don't recall whether
 8 there was a formal separation
 9 agreement between, what I will call
 10 Smile Train and Operation Smile?
 11 A No, I don't.
 12 Q Is Mr. Smith still
 13 practicing?
 14 Do you know?
 15 A Yes. I can put you in touch
 16 with him, if you'd like.
 17 Q Okay.
 18 Thanks.
 19 A Do you want me to --
 20 Q We will reach out for him.
 21 A He works for some Chinese
 22 importer company in Manhattan.
 23 Q If you can send me his
 24 contact information, I would
 25 appreciate it. Thanks.

1 BRIAN MULLANEY - VOLUME I
 2 So let's talk about setting
 3 up Smile Train.
 4 You said -- you said the
 5 existing 501(c) corporation, which was
 6 your New York Operation Smile was
 7 still apparently in existence?
 8 A Yes.
 9 Q Okay.
 10 So what did you do?
 11 A Well, my Jones Day lawyer
 12 Rob Smith changed all the names, and
 13 that was going to be our new name.
 14 Q The name was changed to
 15 Smile Train?
 16 A Yes.
 17 Q Okay.
 18 A He wrote up some bylaws, and
 19 we created a small board.
 20 Q Who was on that board?
 21 A It was Charles Wang, and me,
 22 and Rob Smith and I believe Joe
 23 McCarthy -- Dr. Joe McCarthy from NYU,
 24 and Ann Ziff. I don't know if I said
 25 her.

1 BRIAN MULLANEY - VOLUME I
 2 A We stole away -- DeLois
 3 Greenwood quit Op Smile, or was
 4 actually fired. They were mad at her
 5 because she didn't like the Pope
 6 project, and she liked the
 7 Smile Train, so she came with us. And
 8 then we hired a headhunter to hire our
 9 first CEO.
 10 Q Who was that?
 11 A His name was Don Moores,
 12 M-O-O-R-E-S, and he came fresh out of
 13 the Peace Corps.
 14 Q Okay.
 15 MR. LILIEN: Fresh out of
 16 the Peace Corps in what capacity?
 17 THE WITNESS: He just got
 18 back from Uganda or Congo, a
 19 two-year stint. He was a
 20 volunteer.
 21 MR. LILIEN: He was a
 22 volunteer; he wasn't in
 23 administrative capacity?
 24 THE WITNESS: No.
 25 BY MR. CURCHACK:

1 BRIAN MULLANEY - VOLUME I
 2 Q Did Operation Smile continue
 3 in operation?
 4 A Oh, yes.
 5 Q Is it still in operation?
 6 A Yes.
 7 Q Okay.
 8 So what was your -- now,
 9 when Smile Train was set up, you were
 10 still running, I guess, the second
 11 version of your ad agency?
 12 A Yes.
 13 Q Okay.
 14 And did you have any formal
 15 title other than being on the board of
 16 directors?
 17 A At Smile --
 18 Q At Smile Train?
 19 A At Smile -- sorry. I still
 20 mix them up.
 21 No, I was just on the board,
 22 but I was very -- there's only four of
 23 us or five of us. The first thing of
 24 business was to hire a CEO.
 25 Q Who did you hire?

1 BRIAN MULLANEY - VOLUME I
 2 Q What money did Smile Train
 3 have at that point?
 4 A Well, all we had was the
 5 transfer from Operation Smile.
 6 Q Okay.
 7 A We didn't start raising
 8 money until years later.
 9 Q Okay.
 10 So what did you -- what did
 11 Smile Train do when you first -- when
 12 it first was set up?
 13 A Well, we had a lot of money
 14 because in addition to the WonderWork
 15 money, Wang had -- made a big pledge
 16 of a million shares of CA stock.
 17 MR. LILIEN: WonderWork
 18 money?
 19 THE WITNESS: Smile Train.
 20 MR. LILIEN: You mentioned
 21 WonderWork.
 22 BY MR. CURCHACK:
 23 Q You meant to give
 24 Operation Smile money.
 25 When you first --

1 BRIAN MULLANEY - VOLUME I
 2 A We are talking Smile Train
 3 now. We got the money from
 4 Operation Smile, and it's 2000 --
 5 2000, 1999, yes.
 6 Q And --
 7 A We had, in addition to that,
 8 four-something million. We had a
 9 pledge from Charles Wang for one
 10 million shares of CA stock and
 11 matching that was his mentor or patron
 12 Walter Haefner, who owned one of the
 13 companies Wang bought, and he pledged
 14 a million shares as well.
 15 So we had -- the stock was
 16 at like 35 bucks. That's \$60 million.
 17 So we didn't worry about raising money
 18 at all. We worried about getting
 19 surgeries going as quickly as we
 20 could.
 21 Q What was the model for
 22 getting those surgeries done?
 23 A It was a tricky business
 24 because I never started a charity
 25 before and this whole new model was

1 BRIAN MULLANEY - VOLUME I
 2 I didn't go there. DeLois
 3 went and met with him for a week and
 4 saw he was a good surgeon and gave him
 5 a pilot grant to do 2,000 surgeries.
 6 He finished them in six months.
 7 Operation Smile hadn't done
 8 2,000 surgeries in 10 years. So we
 9 go, wow, this is a great model. These
 10 local guys can do it. When we left
 11 Operation Smile, Magee said children
 12 are going to die if you do this.
 13 Local surgeons stink. They kept
 14 saying, Brian, you are not a doctor.
 15 You don't know what you are doing. We
 16 started with that and then found other
 17 surgeons like that and started to grow
 18 like crazy around China because the
 19 surgeons there are excellent. They do
 20 more clefts than American surgeons.
 21 They are talented and care about their
 22 kids.
 23 So we started to grow very
 24 quickly in China. And then Wang was
 25 going to be in India for a press

1 BRIAN MULLANEY - VOLUME I
 2 brand new of local surgeons, so we
 3 didn't know how to do it.
 4 We went to the Chinese
 5 government and they said just give us
 6 the money and we will take care of it
 7 and we didn't trust them and we didn't
 8 like that.
 9 So we went to China, because
 10 we had to start there because Wang was
 11 Chinese. He wanted us to start there.
 12 That was the least we could do because
 13 he was giving us a lot of money.
 14 To operate in China, you
 15 need a shadow company or Chinese
 16 company, so they hooked us up with
 17 China Charity Federation. That was
 18 our sponsor charity. We met with
 19 them. And we told them we wanted to
 20 find local surgeons to do clefts and
 21 they said, well, this is a crazy idea.
 22 No one has done this before, but we
 23 have this one surgeon out in Shanghai,
 24 China. You should go meet him. He's
 25 our best cleft surgeon.

1 BRIAN MULLANEY - VOLUME I
 2 conference. He said I want to mention
 3 this program in India. So we started
 4 finding partners in India and then
 5 that grew really quick. Our
 6 surgeries, the first year were 2,000.
 7 But then the second and third year,
 8 they were 20,000 and 30,000, 40,000.

9 Now, Op Smile when I joined
 10 them were doing 3,000 surgeries a year
 11 after 20 years, so we took off like a
 12 Google startup. So it was just like
 13 an entrepreneurial thing. It was very
 14 busy and hectic and fast-growing.

15 Q What was your role as a
 16 board member at Smile Train?

17 A Well, it changed. We hired
 18 Don Moores. He was really slow. He
 19 was -- after like a year, we weren't
 20 close to doing any surgeries. He said
 21 it's going to be years and years. We
 22 have to establish relationships. So
 23 we fired him. We hired a guy from
 24 Sesame Street named -- I am blanking
 25 on his name. A really nice guy. But

1 BRIAN MULLANEY - VOLUME I
 2 also really slow.
 3 His name is Boris. He just
 4 wasn't -- we had \$60 million in the
 5 bank. We weren't doing the growth I
 6 just said. We were doing no
 7 surgeries. So in 2001, we had done,
 8 like, no surgeries or 500 surgeries
 9 after two years and we had
 10 \$60 million. So we fired him. I
 11 agreed to become interim president for
 12 one year.
 13 So that was April of 2001.
 14 So that's when my role changed from a
 15 board member to employee.
 16 Q And so at that point -- had
 17 you received any compensation --
 18 A No.
 19 Q -- from Smile Train before
 20 that?
 21 A No.
 22 Q Did you start getting
 23 compensation at that point?
 24 A Yes.
 25 Q Do you remember how much?

1 BRIAN MULLANEY - VOLUME I
 2 Greenwood went and found that guy.
 3 I don't know how -- I don't
 4 remember if it was Boris was on
 5 duty or Don Moores. I think
 6 Boris.
 7 BY MR. CURCHACK:
 8 Q Other than that one surgeon
 9 prior to your becoming interim CEO --
 10 A Yeah.
 11 Q -- had Smile Train paid for
 12 any surgeries?
 13 A I don't know the exact --
 14 that's 17 years ago. I don't know.
 15 There may have been a couple others,
 16 but the first two COs we hired were
 17 slow and bureaucratic and that's why
 18 we let them go.
 19 Q So when did you stop all
 20 work related to your advertising
 21 agency?
 22 A When I started at
 23 Smile Train.
 24 Q Started as the CEO or --
 25 A Yes.

1 BRIAN MULLANEY - VOLUME I
 2 A No.
 3 MR. LILJEN: One more
 4 question.
 5 The 2,000 surgeries you
 6 mentioned in China, Mr. Wang was
 7 there, what year did that occur?
 8 THE WITNESS: Oh, the guinea
 9 pig in Shanghai, the 2,000
 10 surgeries?
 11 MR. LILJEN: Yeah.
 12 THE WITNESS: In 2000 or
 13 2001, right around there.
 14 MR. LILJEN: How did that
 15 correlate with the hiring of the
 16 first two CEOs?
 17 THE WITNESS: It was kind of
 18 incidental to them because I don't
 19 know -- I don't remember anything
 20 specific about that.
 21 We wanted to do a hundred
 22 thousand surgeries a year, so
 23 those 2,000 that we did was a
 24 six-month project. That was a
 25 one-off thing because DeLois

1 BRIAN MULLANEY - VOLUME I
 2 MR. LILJEN: Did you sell
 3 the business?
 4 THE WITNESS: Well, I sold
 5 it previously in '96.
 6 MR. LILJEN: I thought you
 7 bought it back.
 8 THE WITNESS: I did, but
 9 there was really nothing to sell.
 10 We had selected assets. I bought
 11 a couple leases back. My partner
 12 was 10 years older and kind of
 13 wanted to retire, so it just
 14 closed down.
 15 BY MR. CURCHACK:
 16 Q That was Mr. Schell?
 17 A Yes.
 18 Q Okay.
 19 So you're now the interim
 20 CEO?
 21 A I was president, actually.
 22 Q Okay.
 23 President of Smile Train and
 24 on the staff, you got DeLois
 25 Greenwood?

1 BRIAN MULLANEY - VOLUME I
 2 A Yes.
 3 Q Anybody else?
 4 A Yes. Michele Sinesky, Troy
 5 Reichman. There was like a staff of
 6 five.
 7 Q Okay.
 8 And the board was still the
 9 same?
 10 You said there were 15
 11 people, I think.
 12 A Five people.
 13 Q Five. That was you,
 14 Smith --
 15 A Ann Ziff.
 16 Q -- Ziff, Wang and McCarthy?
 17 A And Joe McCarthy.
 18 MR. LILIEN: Wang is the
 19 chair?
 20 THE WITNESS: No, Ann Ziff
 21 was the chair.
 22 BY MR. CURCHACK:
 23 Q So what happened then?
 24 A Well, then we -- it was a
 25 mess because there was no map or there

1 BRIAN MULLANEY - VOLUME I
 2 aside on these missions, they all
 3 loved the idea of being, you know,
 4 empowered, to help their own kids.
 5 So it was really hectic, and
 6 our surgeries went from 2,000 a
 7 year -- you got the board
 8 presentations. You could see 2,000 to
 9 10,000 to 20- to 30,000 to 40,000 to
 10 50,000.
 11 Q We are still with
 12 Smile Train?
 13 A Yes.
 14 Q But you were still working
 15 off of that initial capitalization of
 16 the \$60 million?
 17 A We hadn't received Wang's
 18 and -- capitalization, and Haefner
 19 decided to pay his in cash, five
 20 million a year over seven years or
 21 seven million over five years. I
 22 don't remember. We had plenty of
 23 money.
 24 There was an urgency to get
 25 the money out the door and help people

1 BRIAN MULLANEY - VOLUME I
 2 was no business plan. They would just
 3 go to work every day and say, oh, I
 4 think I am going to go to China next
 5 month or something.
 6 So we had the success with
 7 the one surgeon. We thought that was
 8 a test program that worked really
 9 well. And we said, how are we going
 10 to systemize it. We created a whole
 11 business plan to generate -- to find
 12 surgeons and hospitals that could do
 13 the surgeries.
 14 And we had to decide how we
 15 would interact with them. We pay the
 16 surgeons. We pay the hospitals. How
 17 much would we pay them? How would we
 18 pay them? We built a whole business
 19 plan over the next year, year and a
 20 half.
 21 And the phone started
 22 ringing off the hook, because as word
 23 spread among these surgeons, who were
 24 used to rich Americans coming in and
 25 humiliating them and pushing them

1 BRIAN MULLANEY - VOLUME I
 2 and stuff.
 3 Q Okay.
 4 So when did Smile Train
 5 start raising money?
 6 A Well, one of the first --
 7 within the first year I went to the
 8 board and said, now we are doing
 9 surgeries and we are scaling extremely
 10 fast and we need to develop an ability
 11 to raise money, because all the money
 12 is going out. We are not raising any
 13 money.
 14 So I made a board
 15 presentation. And my background was
 16 advertising, so I found a firm that
 17 would place remnant ads.
 18 Do you know what those are?
 19 They are space the newspaper
 20 can't sell. So you don't know when
 21 your ad is going to run or where, but
 22 it cost 90 percent less. So we
 23 started to run remnant ads with a
 24 coupon that said, "Give a kid with a
 25 cleft a second chance in life." I did

1 BRIAN MULLANEY - VOLUME I
 2 all the ads. They started to become
 3 very successful. We started to raise
 4 money that way.

5 Q Do you remember when this
 6 was?

7 A Right after I started, like
 8 2002.

9 Q Okay.

10 Keep going.

11 A So a gentleman who ran the
 12 largest direct mail firm in America
 13 saw the ads and said this would really
 14 work in direct mail.

15 Q Who was that?

16 A I will think of it. It's
 17 Operation Smile's firm today. So we
 18 said, okay, we will do a test with you
 19 and we met with them and said how does
 20 direct mail work because we didn't
 21 know and they said, like, how much
 22 does a letter cost? How much does the
 23 printing cost? You don't need to know
 24 that. Just give us a hundred grand or
 25 150 grand and this is how much is

1 BRIAN MULLANEY - VOLUME I
 2 So we shook hands with them and said
 3 good-bye and we started our direct
 4 mail program in-house.

5 MR. LILIEN: When you say
 6 one and a half percent -- one and
 7 half response rate, what does that
 8 mean?

9 THE WITNESS: This is
 10 acquisition mailing to acquire
 11 donors. So direct mail is you're
 12 acquiring a donor, and once I have
 13 Jason's name, I cultivate you.
 14 You're a donor.

15 So in acquisition mailings,
 16 you always lose money. Usually a
 17 good mailing you lose half. So it
 18 costs \$2 to raise a dollar to
 19 acquire people. And that's -- so
 20 the 1 percent -- one and a half
 21 percent would be we mailed a
 22 million people and we got 10,000
 23 responses, you know, 1 percent.

24 BY MR. CURCHACK:

25 Q So the percentage of --

1 BRIAN MULLANEY - VOLUME I
 2 going to come in. They go away. So I
 3 didn't really trust them.

4 And so they did that. Then
 5 I secretly wrote our own letter and
 6 mailed it to 50,000 people.

7 Q Where did you get the
 8 mailing list?

9 A My secretary Karen is
 10 phenomenal. She found a list of
 11 companies. She rented a list, and we
 12 did our own mailing. And we met with
 13 them again and -- Russ Reid -- Russ
 14 Reid is the name of that company.

15 So we met with them and they
 16 had a half percent response rate and
 17 they said -- it was a disaster. It
 18 was like nowhere near the results they
 19 had promised, and they said but we
 20 know what the problem is. We
 21 shouldn't have said the surgery was
 22 \$250. It's too expensive. We have to
 23 change that.

24 Our mailer had tripled the
 25 response rate, one and a half percent.

1 BRIAN MULLANEY - VOLUME I

2 A Of responses.

3 Q -- responses to the mailing?

4 Now, was that the first
 5 direct mail piece that you had ever
 6 sent out?

7 A Yes, to consumers.

8 Q Right.

9 Other than the
 10 business-to-business stuff?

11 A Yeah.

12 Q Okay. So keep going.

13 What happened then?

14 A So we kind of did the best
 15 we could on our own for a year or two.
 16 The results were really good.
 17 Americans really liked that they could
 18 give money to a charity that solved
 19 the problem, that had a before and
 20 after picture, that was so cheap and
 21 we were a tiny charity and we said we
 22 are small and this is real. And they
 23 called up, and I would answer the
 24 phone.

25 So we grew really quickly,

1 BRIAN MULLANEY - VOLUME I
 2 and the donors liked it. It got too
 3 big for us to manage in-house so, we
 4 started looking for an outside vendor
 5 and we ended up at Target Market Team.
 6 Q This is Smile Train?
 7 A Yes.
 8 Q Okay.
 9 And what was your
 10 relationship with them?
 11 A They were a vendor, but they
 12 were very smart, very experienced and
 13 they helped us find better printers so
 14 we could get better prices and they
 15 coordinated all the work.
 16 There's a ton of work to
 17 getting a letter out in the mail at a
 18 good price on a certain date. And
 19 then when the results come back in,
 20 you need help analyzing all the
 21 results to see which lists worked and
 22 what didn't work and all that.
 23 So they kind of took us
 24 under their wing and we learned a lot
 25 under them and it was a great

1 BRIAN MULLANEY - VOLUME I
 2 Q So from --
 3 A Although, formally, my term,
 4 they say went through June 2011, but
 5 physically I left in October 2010.
 6 Q So from 2002, when you first
 7 put the remnant ads in until
 8 October 2010, briefly could you sort
 9 of describe the course of Smile Train?
 10 A We had a great 10-year run.
 11 We earned the trust of millions of --
 12 more than 2 million donors. We found
 13 great partners everywhere that could
 14 do surgeries safely.
 15 We had a really good medical
 16 advisory board because it's -- don't
 17 do surgery because if you mess up,
 18 people die. It was like a dream. And
 19 the fundraising was going well. The
 20 programs were going well.
 21 We wanted to raise awareness
 22 about the problem with clefts. We did
 23 a movie and won an Oscar. That was in
 24 the meeting notes. Let's try to do a
 25 movie and win an Oscar. We

1 BRIAN MULLANEY - VOLUME I
 2 partnership.
 3 MR. LILIEN: Who was your
 4 principal contact there at the
 5 time?
 6 THE WITNESS: Ron Bell.
 7 MR. LILIEN: Ron Bell was
 8 the principal person throughout
 9 the relationship while at
 10 Smile Train?
 11 THE WITNESS: Yeah. I know.
 12 It's -- yes, Smile Train.
 13 He's a Harvard business
 14 school guy. He's really sharp.
 15 He's probably the best in the
 16 business.
 17 BY MR. CURCHACK:
 18 Q Since Smile Train was -- how
 19 long did this relationship with TMT go
 20 on?
 21 A Well, they are still there.
 22 Q Okay.
 23 When did you leave
 24 Smile Train?
 25 A I left in October 2010.

1 BRIAN MULLANEY - VOLUME I
 2 distributed that Oscar to a million of
 3 the richest homes in America and
 4 licensed it to HBO. It's been seen by
 5 30 million people. So it was all
 6 perfect.
 7 And then in 2010, Charles
 8 Wang left us alone. He was my
 9 co-founder. He would show up for
 10 three meetings a year. He would never
 11 go to the office any other times. He
 12 was not very involved. Something
 13 changed with him, and he wanted more
 14 control.
 15 Q Before we get there --
 16 A Okay. All right.
 17 Q -- you said your programs
 18 were doing well, I think.
 19 A Yes.
 20 Q What exactly was the
 21 program?
 22 A The program was finding
 23 hospitals in poor countries where
 24 there was a great need for cleft
 25 surgery, so we would -- you can't just

1 BRIAN MULLANEY - VOLUME I
 2 say it's a developing country, because
 3 if you look at it closely, the
 4 hundredth poorest country, there's a
 5 huge difference between Mexico and
 6 Pakistan.

7 So we would find the poorest
 8 countries with the greatest number of
 9 clefts and target them. We would not
 10 go to Sierra Leone and Sri Lanka. We
 11 would go to places that we could scale
 12 up. We learned that by starting in
 13 China and India.

14 We find a hospital that --
 15 you got to understand, there's no
 16 concept of pro bono over there.
 17 Everyone comes up to me, and says let
 18 the doctor do it for free. Everyone
 19 is poor. The hospital is poor.
 20 Doctors are poor. The nurses make \$10
 21 a month.

22 Typically, the only people
 23 who get surgery are people with money.
 24 So we find a hospital that did a
 25 hundred cleft surgeries last year,

1 BRIAN MULLANEY - VOLUME I
 2 number, but we started out at 250,
 3 which is pretty good. The surgery in
 4 US is 5,000 or more. And we would ask
 5 them -- we wanted to make sure these
 6 were incremental surgeries. We wanted
 7 to make sure we weren't displacing
 8 money.

9 And I was convinced they
 10 were going to cheat us. So in 2002,
 11 2003 we developed a database and we
 12 forced them to upload their charts
 13 to -- this is before any hospitals
 14 were computerized in America. It was
 15 an electronic health records database.
 16 That was awesome because -- we did it
 17 for fraud. So we didn't want people
 18 submitting a record more than once and
 19 getting paid for it because it was
 20 like the invoice.

21 But then we said, wow, we
 22 have a hundred thousand records and
 23 each one has a before and after
 24 picture. We said this would be a
 25 great tool for quality. So we had one

1 BRIAN MULLANEY - VOLUME I
 2 because a hundred people could pay.
 3 We go to them and say we want to scale
 4 you up and help you, how much does it
 5 cost to do a surgery and they would
 6 say \$800.

7 We would say we will give
 8 you 250 but we will buy a thousand of
 9 them, and we would scale them up,
 10 while monitoring their quality and
 11 monitoring their financial integrity
 12 with anti-fraud stuff to make sure the
 13 quality and safety was good and that
 14 the money was going where we wanted it
 15 to.

16 Q How did you -- how did they
 17 pay for the other \$550 of the \$800
 18 surgery, if you only gave them 250?

19 A The \$800 was because they
 20 went to our website and they saw it
 21 cost 750 or whatever. That was a
 22 fictitious number. We would haggle
 23 with them. Some hospitals are poorer
 24 than others or richer than others.

25 We would try to find a good

1 BRIAN MULLANEY - VOLUME I
 2 of our expert cleft surgeons in Texas
 3 start reviewing them and grading them
 4 and so that program grew and pretty
 5 soon we had a quality rating for every
 6 participating surgeon.

7 So any month we could say
 8 here are our ten worst surgeons and
 9 wrap our arms around them or help them
 10 or make them better and we had the
 11 leverage with the money, that they
 12 would do whatever we wanted and send
 13 an American surgeon there.

14 Q Okay.

15 So during this period, you
 16 started doing direct mail?

17 A Yes.

18 Q Those direct mail
 19 solicitations I take it were
 20 successful?

21 A Yes, beyond our wildest
 22 dreams.

23 Q So let's go to 2010.

24 I think you said it was that
 25 things started -- the relationship

1 BRIAN MULLANEY - VOLUME I
 2 with Mr. Wang started to change.

3 A Right. So since 2007, if
 4 you look at our board stuff, I would
 5 mention, wow, we got \$20 million extra
 6 in the bank. We got \$30 million extra
 7 in the bank. We got 40 million extra.
 8 It kept growing.

9 My name was on all the
 10 letters. I knew a lot of the donors,
 11 so it made me uncomfortable. As early
 12 as 2006, 2007, I talked about
 13 expanding the program. Then 2008 came
 14 along and the world fell apart.

15 Q What do you mean -- what do
 16 you mean by "expanding the program"?

17 A We were only doing cleft
 18 surgeries, and I'd visit these
 19 hospitals and they would say, Brian,
 20 and they begged me to go to the burn
 21 ward or begged me to go to the
 22 orthopedic ward and see the crippled
 23 kids with clubfoot or beg me to see
 24 fistula -- you know, because all these
 25 hospitals are overflowing.

1 BRIAN MULLANEY - VOLUME I
 2
 3 THE WITNESS: Yeah, and it's
 4 untruthful. It's not Harvard
 5 going into an endowment. The
 6 donors expected us to spend it. I
 7 was writing letters saying your
 8 donation is going to give a kid a
 9 second chance at life, not sitting
 10 in some bank, Brown Brothers.

11 So I was pushing and I
 12 didn't want to run a bank. So in
 13 the September board meeting, as
 14 you can see in the minutes,
 15 October 2009, I went to the board
 16 and said this is getting
 17 ridiculous. We are over a hundred
 18 million now, and we talked about
 19 it before, but I want to go do
 20 some testing for blindness, to see
 21 if a blindness direct mail piece
 22 would work. And the board said
 23 yes at that meeting. And so we
 24 spent the fall doing that. We
 25 decided not to do the mailer
 because the mailer takes

1 BRIAN MULLANEY - VOLUME I
 2 We were like the rich white
 3 guys coming and only helping clefts
 4 when they had much bigger problems.

5 Q Okay.

6 A The money kept mounting up.
 7 And 2008 came. I put all my plans on
 8 hold. In 2008, we panicked also when
 9 Lehman went down and we cut all of our
 10 contributions around the world to all
 11 our partners because we thought the
 12 world was coming to an end.

13 It turned out to be one of
 14 our best years ever in terms of
 15 fundraising. So now it's 2009 and we
 16 are back and raising much more than we
 17 need and the surplus is 90 million, a
 18 hundred million. It's not good. So
 19 in --

20 MR. LILIEN: What is not
 21 good, I'm sorry?

22 THE WITNESS: It's not good
 23 to raise that money and not spend
 24 it.

25 MR. POLKOWITZ: Excess cash?

1 BRIAN MULLANEY - VOLUME I
 2
 3 three months to figure out. It's
 4 got a longer lead time where you
 5 can place an ad in The New York
 6 Times and see if it works or not.

7 So we placed ads in The New
 8 York Times and Wall Street Journal
 9 that fall, and the results were
 10 very encouraging.

11 MR. LILIEN: What did the ad
 12 say?

13 THE WITNESS: Well, the
 14 first ads -- we knew nothing about
 15 blindness. So we said, a seven
 16 cent tablet of vitamin A will keep
 17 this kid from going blind. That
 18 was one ad. A \$7 pair of glasses
 19 will let this kid go to school.
 20 And the third one was a \$250
 21 surgery would give this blind kid
 22 their eyesight back.

23 MR. LILIEN: And the board
 24 approved spending Smile Train's
 25 funds --

THE WITNESS: Yes.

1 BRIAN MULLANEY - VOLUME I
 2 MR. LILIEN: -- to launch
 3 this program?
 4 THE WITNESS: To do the
 5 test.
 6 MR. LILIEN: To do the test?
 7 THE WITNESS: Yes.
 8 MR. LILIEN: Was Mr. Wang
 9 one of those board members that
 10 approved it.
 11 THE WITNESS: Yes. Yes.
 12 He's revised a lot of his stuff.
 13 Yes. The minutes show it and
 14 presentation shows it and
 15 Rob Smith, who was there, will
 16 tell you, and the other board
 17 members.
 18 So I was all excited. Now,
 19 it's February 2010, and I go to
 20 the board with these results that
 21 are good and my plan -- my plan
 22 was, look, we can't spend more
 23 than 40 million a year on clefts.
 24 We were trying to give it away in
 25 China. We were buying vans like a

1 BRIAN MULLANEY - VOLUME I
 2 THE WITNESS: Not much,
 3 because it was an acquisition, and
 4 I don't know -- 40, 50 grand,
 5 something like that.
 6 MR. LILIEN: Okay.
 7 THE WITNESS: So Wang came
 8 along later and shut it all down
 9 and dispersed that to blindness
 10 charities.
 11 So I forget where I was.
 12 BY MR. CURCHACK:
 13 Q Why did he shut it down?
 14 A Well, let me finish with the
 15 meeting so you have the full context.
 16 Q Sure.
 17 A So previously in that fall
 18 also, or that summer, the Chinese
 19 government -- they knew us now. We
 20 were the biggest children charity in
 21 China, and we met the administrative
 22 of health. They have 75,000
 23 hospitals. We had money coming out of
 24 our ears, so we said let's go to the
 25 government and see if they will help

1 BRIAN MULLANEY - VOLUME I
 2 drunken sailor. There was no way
 3 to spend more, and the surgeries
 4 had stopped growing.
 5 So we grew from 2,000 to 20,
 6 30, 40. They leveled off at
 7 around 120,000 surgeries a year
 8 and --
 9 MR. LILIEN: What did you
 10 do, Brian, with the money you
 11 raised from this test program?
 12 THE WITNESS: Oh, Wang shut
 13 it down, and we gave it to
 14 charities that do blindness.
 15 MR. LILIEN: Let's explore
 16 this for a moment.
 17 THE WITNESS: Yeah.
 18 MR. LILIEN: When were the
 19 ads placed, approximately when?
 20 THE WITNESS:
 21 December 2009 --
 22 November/December 2009, somewhere
 23 in January.
 24 MR. LILIEN: How much money
 25 was raised roughly?

1 BRIAN MULLANEY - VOLUME I
 2 us expand.
 3 We are only in 150 hospitals
 4 in China. So the government of China
 5 was great. They go we want to go from
 6 150 to 400. This is after being in
 7 China for nine years, eight years, you
 8 know. So it's China, and they go
 9 boom. And we are in 400 hospitals in
 10 six months -- maybe a year. That is
 11 the beauty of China.
 12 But the surgeries didn't go
 13 up. We were all freaked out. Why
 14 aren't they going up. We go, did they
 15 pick the wrong hospitals. Did they
 16 not give them directions? So we went
 17 to Steve Levitt, who is a brilliant
 18 guy. He's on our board of governors.
 19 We said, Steve, what do you think is
 20 going on here? And we gave him all of
 21 our records. And he's a brilliant
 22 guy. What he did -- I will keep this
 23 short.
 24 He said the median age of
 25 your patients when you started in 2001

1 BRIAN MULLANEY - VOLUME I
 2 was 4 and a half years old. So in
 3 America, 5,000 clefts are born, and
 4 the median age is nine months when
 5 they get surgery. So it's four and a
 6 half years. Now it's close to two
 7 years. The median age has dropped
 8 down.

9 If you look at the
 10 distribution of the surgeries, many
 11 fewer 15-year-olds, 12-year-olds,
 12 nine-year-olds. Because in America,
 13 they are all nine months. Ethiopia
 14 the operating median age is 11,
 15 because they are poor. You see this
 16 relationship with the backdrop.

17 So he gave us these maps and
 18 showed us that. And we said, well,
 19 maybe it's China. Let's look at
 20 India. Same thing. India was poorer
 21 than China. Their median age started
 22 at six and half. After nine years of
 23 our surgeries and raising awareness
 24 about it and all of that stuff, it was
 25 down to three.

BRIAN MULLANEY - VOLUME I
 they are down to 105,000.

He didn't want spending to
 go down in China. He told us, you
 need to spend a lot of money
 there. My businesses are there.
 My future is there. We met the
 president of China. He met Jiang
 Zemin. I was with him meeting
 him.

He has a lot of stuff going
 on. He wanted spending up, up, up
 in China. He saw my plan, which
 was really -- I wasn't going to
 close down spending in China. And
 I knew that he wanted to spend in
 China.

I said blindness is a huge
 problem in China. He hated the
 idea. I said let's take five
 million out of 135 million was the
 backlog then. It's going up --

BY MR. CURCHACK:

Q By "backlog" you mean cash?
 A Surplus of unused donations.

1 BRIAN MULLANEY - VOLUME I
 2 So we go, wow, we have this
 3 tool that can tell you. We have done
 4 many more surgeries than we thought.
 5 The backlog is almost cleaned up.
 6 These surgeries have no place to go
 7 but down. We really have to spend
 8 money on other stuff.

9 So that was part of my
 10 presentation. Wang hated that part
 11 because he wanted spending in China to
 12 go up.

13 MR. LILIEN: When was this,
 14 Brian?

15 THE WITNESS: This was at
 16 the board meeting in
 17 February 2010. So what I was
 18 saying was clefts are still going
 19 to be born, but the big number is
 20 the backlog. When you clean up
 21 the backlog, you're dealing with
 22 the new births.

23 I say clefts are going to go
 24 down. It is 125,000 today. If
 25 you go to the Smile Train website,

BRIAN MULLANEY - VOLUME I
 In my presentation I said this is
 going to hit 500 million. Here is my
 data and here is my ideas and here is
 my plan and he reacted, pounded the
 table. He said that's bullshit.
 Surgery is going to go up. Steve
 Levitt is a moron.

MR. LILIEN: Was this the
 first time that you and Mr. Wang
 had that discussion?

THE WITNESS: No, I tried to
 sell it to him privately. And
 then he was really upset that day.
 And screamed. I don't think we
 should go into this expanding the
 mission and he said no, no. I
 want you to make that presentation
 and watch how your friend
 Don Murphy votes.

MR. LILIEN: When did that
 private conversation take place?

THE WITNESS: It happened
 immediately before that board
 meeting and it happened a month

1 BRIAN MULLANEY - VOLUME I
 2 earlier or two. I used to meet
 3 him privately and stuff.
 4 I was shocked. Don Murphy
 5 was a friend of mine who I brought
 6 on the board and he told me he
 7 controlled his vote. I said,
 8 well, look, I don't want to be out
 9 of sync with you. We have been
 10 friends 23 years. Let's work this
 11 out. And he said no, no. I want
 12 you to go ahead.
 13 MR. LILIEN: When you went
 14 into the board meeting, you were
 15 expecting a reaction from
 16 Mr. Wang?
 17 THE WITNESS: I always
 18 thought I could talk him into it.
 19 It was the right thing to do. We
 20 would have given -- restored the
 21 eyesight of a million kids in
 22 China as well. I knew that was
 23 important to him, and I respected
 24 that. We never would have had a
 25 Smile Train without him.

1 BRIAN MULLANEY - VOLUME I
 2 going to keep raising \$150 million a
 3 year that wasn't going to be spent. I
 4 thought he would cool off.
 5 That was February. I said
 6 let's do a meeting in April. Let's
 7 have a strategic meeting on what to do
 8 with all this money. It was going to
 9 go up. He agreed to that special
 10 board meeting in April. Then I get on
 11 an airplane to India on March 3rd, and
 12 March 4th he started a takeover of the
 13 board.
 14 MR. LILIEN: What does that
 15 mean?
 16 THE WITNESS: He sent in Bob
 17 Bell, his accountant of 35 years,
 18 to our offices saying he need to
 19 go through all our books and all
 20 my expense accounts, looking for
 21 dirt.
 22 And they called me in India,
 23 the people running, crying, and
 24 said what is he doing. He said
 25 this is a board investigation.

1 BRIAN MULLANEY - VOLUME I
 2 Something had changed.
 3 He -- his businesses were all
 4 going bankrupt. His accountant
 5 Bob Bell told me all his
 6 businesses are bankrupt except
 7 Smile Train. I said, well,
 8 Smile Train isn't a business. He
 9 said, yeah, but it has a
 10 \$100 million.
 11 So I was met with fury. I
 12 thought we would have a
 13 discussion. He wouldn't let
 14 anyone discuss it. It was a
 15 disaster.
 16 BY MR. CURCHACK:
 17 Q So the board voted on your
 18 proposal to expand --
 19 A There wasn't any discussion.
 20 He pounded the table and screamed and
 21 that was it.
 22 Q Okay.
 23 And then what happened?
 24 A So he said -- I said, I
 25 didn't know what to do. I wasn't

1 BRIAN MULLANEY - VOLUME I
 2 Bob Bell says that. I call other
 3 board members, Rob Smith. There
 4 is no board investigation. There
 5 was no discussion.
 6 No, we don't need to do
 7 anything. When I called Don
 8 Murphy, I knew he was bought then.
 9 He paused and said, well, he's
 10 chair of the audit committee. I
 11 guess he can do whatever he wants.
 12 So they went looking through
 13 all this stuff. They found
 14 nothing. And the April meeting
 15 was coming up and I asked Ann Ziff
 16 to call Bob -- Don Murphy, who was
 17 a very close friend of hers,
 18 because he was the swing vote. We
 19 had six, seven people on the
 20 board, and three of them were Wang
 21 and his employees. And he would
 22 have four if he had Don Murphy.
 23 Don Murphy drove out and
 24 told Wang he wasn't going to go
 25 through with it. He chickened

1 BRIAN MULLANEY - VOLUME I
 2 out. That bought me more time at
 3 the regular meeting. I was
 4 running around to Jones Day and
 5 law firms to stop him from taking
 6 over the charity. There was
 7 nothing I could do.

8 In June, he put another
 9 lawyer on the board and an
 10 accountant, in June, and voted him
 11 out. Rammed him down our throat.
 12 Then it was over. He called me
 13 into his office a week later,
 14 two weeks later and said you got
 15 to figure out how to get lost.
 16 This is all my money, and this is
 17 my show now. So you have to find
 18 a way to disappear.

19 That was July 7th.

20 BY MR. CURCHACK:

21 Q Did he fire you?

22 A No.

23 Q He asked you to resign?

24 A No. So that was July 7th.

25 And I asked him -- you know, he was

1 BRIAN MULLANEY - VOLUME I
 2 him away that summer. They made me
 3 leave. They went into executive
 4 session, and then they held a kangaroo
 5 court saying Mullaney has got to go.

6 The two independent
 7 directors fought for me for like
 8 three hours, but it just became how is
 9 he going to go. Wang said walk him
 10 out on the street. Screw him. They
 11 said this is going to be a PR debacle.

12 So they brought me in and
 13 said all right. If you resign, we are
 14 going to let you finish your term to
 15 June, and then we are going to give
 16 you a consulting agreement and then we
 17 are going to give you severance, and
 18 we are going to give you all this
 19 stuff.

20 I love the charity. I
 21 didn't want to be in The New York
 22 Times. I didn't want to be in a mud
 23 fight with Charles Wang, who is a very
 24 controversial guy. So I agreed to go.

25 Q And so there was -- you got

1 BRIAN MULLANEY - VOLUME I
 2 just on a rampage. And then September
 3 he called a special meeting of the
 4 board, and we didn't know what to do
 5 that summer. We were like he's going
 6 to take it over and we called our
 7 counsel for Smile Train of 10 years
 8 and he said he couldn't call me back.
 9 He was on vacation. He was secretly
 10 hired by Wang that summer.

11 Q Who was that?

12 A Omar -- weird name.

13 Q Do you remember the firm
 14 name?

15 A Patterson.

16 Q Patterson Belknap?

17 A He's a non-profit guy. So I
 18 am calling him. I say I have a
 19 director trying to take over the
 20 company. He said I will have to call
 21 you back. I am busy. He never called
 22 us.

23 Then he marched in with
 24 Wang. He was on his payroll. We
 25 found secret documents. Wang hired

1 BRIAN MULLANEY - VOLUME I
 2 some sort of severance package?

3 A No, they never honored any
 4 of it. I got a few more paychecks and
 5 then reneged on everything.

6 Q Did you ever sue them?

7 A No. They started suing me.

8 Q And without getting into
 9 the --

10 A They wanted me to sue them,
 11 but --

12 Q That litigation --

13 A Yeah.

14 Q -- was that ultimately
 15 resolved?

16 A Which litigation?

17 Q You said they sued you.

18 A Oh, it's still going on.

19 This arbitration is the Charles Wang
 20 thing. He sued me in State Court.

21 Q This is Smile Train, we are
 22 talking about?

23 A Charles Wang sued me
 24 personally in State Court.

25 Q Okay.

1 BRIAN MULLANEY - VOLUME I
 2 A Then Smile Train file
 3 lawsuits against me in State Court
 4 that I didn't know about because I
 5 wasn't given notice. Then they filed
 6 a Federal lawsuit against me and
 7 WonderWork and then they filed a
 8 lawsuit against me in London.
 9 Q Hang on. We are not at
 10 WonderWork yet.
 11 A Okay. You are talking about
 12 after I left?
 13 Q I am saying at the time you
 14 left Smile Train --
 15 A Yes.
 16 Q -- in September of 2010 --
 17 A Yeah.
 18 Q -- after that special board
 19 meeting --
 20 A Yeah.
 21 Q -- they offered you a
 22 severance package?
 23 A Right.
 24 Q And you said they honored it
 25 for a couple of months?

1 BRIAN MULLANEY - VOLUME I
 2 THE WITNESS: I left in
 3 October.
 4 MR. LILIEN: And then what
 5 happened after October?
 6 THE WITNESS: They promised
 7 me \$500,000 by December to start
 8 my new charity WonderWork.
 9 BY MR. CURCHACK:
 10 Q They knew you were going to
 11 be starting a new charity?
 12 A Yes.
 13 Q Was that part of the
 14 discussions about the separation?
 15 A Yeah, they said you want to
 16 do blindness? Go do blindness. Start
 17 your own charity. We will give you
 18 half a million dollars.
 19 MR. LILIEN: In form of a
 20 grant?
 21 THE WITNESS: Yes.
 22 MR. LILIEN: Was that
 23 memorialized in writing?
 24 THE WITNESS: Yes.
 25 MR. LILIEN: How was that

1 BRIAN MULLANEY - VOLUME I
 2 A Yeah. That was in
 3 October 13th, I signed it. They gave
 4 me three more paychecks, I believe,
 5 until April -- March, April and then
 6 they stopped without explanation.
 7 They promised me --
 8 MR. LILIEN: Did you say
 9 March, April?
 10 THE WITNESS: Yes.
 11 MR. LILIEN: The timing -- I
 12 want to make sure I understand --
 13 THE WITNESS: Special
 14 meeting in September.
 15 MR. LILIEN: Yeah.
 16 THE WITNESS: I said I will
 17 think about their offer. I agreed
 18 at the meeting in October and
 19 signed it --
 20 MR. LILIEN: Did you
 21 leave --
 22 THE WITNESS: -- under
 23 duress.
 24 MR. LILIEN: You left the
 25 office --

1 BRIAN MULLANEY - VOLUME I
 2 memorialized?
 3 THE WITNESS: It's in my
 4 separation agreement.
 5 BY MR. CURCHACK:
 6 Q Was that a grant to the
 7 charity, or was that compensation to
 8 you?
 9 A No. No. It was a grant to
 10 the charity.
 11 Q To the charity?
 12 A So they said that I would
 13 stay on the payroll through June and
 14 then I would get a one-year consulting
 15 arrangement and then I would get
 16 another bonus and all this stuff. It
 17 was all --
 18 Q Okay. So a couple of
 19 specific questions.
 20 You said -- they said they
 21 would pay you until June, but they
 22 stopped writing the checks in March or
 23 April?
 24 A Yes.
 25 Q They said they would give

1 BRIAN MULLANEY - VOLUME I
 2 you a \$500,000 grant?
 3 A Yeah.
 4 Q Did that grant ever get
 5 made?
 6 A No.
 7 Q So what did you do when they
 8 stopped paying?
 9 A I looked to them and asked
 10 them why.
 11 Q What did they respond?
 12 A They never responded.
 13 Q Okay.
 14 And then at some point,
 15 Charles Wang commenced litigation
 16 against you personally?
 17 A Yes, but before that
 18 happened, the real humdinger was he
 19 got rid of me in October, and my staff
 20 was all shaking. He said all your
 21 jobs are safe. But he got the staff
 22 together and he told the staff that I
 23 had been stealing from the charity for
 24 years.
 25 And he got the managers

1 BRIAN MULLANEY - VOLUME I
 2 Q When you say "we" --
 3 A Independent directors went
 4 running to Jones Day and we
 5 represented them/us and a sent letter
 6 to the AG's office or charities bureau
 7 saying you need to look into this.
 8 A petition went online and
 9 thousands and thousands of Smile Train
 10 donors signed it saying they were
 11 against this and some lawyer had told
 12 Wang that it would be a rubber stamp
 13 with the AG, and the minute he heard
 14 the AG was going to look into what he
 15 was doing, he withdrew the merger and
 16 he blamed it all on me, so we stopped
 17 it.
 18 Q And then -- then he sued
 19 you?
 20 A Then -- that's February,
 21 March. Then he tried to hire DeLois
 22 back, and said I am trying to save
 23 DeLois because the lawsuits are
 24 coming. And come back and work for
 25 me. You have to get away from Brian.

1 BRIAN MULLANEY - VOLUME I
 2 together in December of 2010 and said
 3 he was going to destroy me and if
 4 anyone didn't have the stomach for it,
 5 they should resign right now.
 6 And then a month later, he
 7 announces -- the first week of
 8 February, he announces that he had
 9 secretly met with -- because I stayed
 10 on the board. I was a board member.
 11 So at the February board
 12 meeting, he announced that he had
 13 secretly negotiated a merger agreement
 14 with Operation Smile, and that all the
 15 assets for Smile Train were going to
 16 be sent to Virginia and that was the
 17 new setup.
 18 And a hundred million -- 125
 19 million was going into a special
 20 account he would control with his
 21 employees.
 22 Q Okay.
 23 So did that merger ever
 24 happen?
 25 A No. We --

1 BRIAN MULLANEY - VOLUME I
 2 And she politely declined.
 3 And he filed state lawsuits
 4 that summer 2011, and then the big one
 5 was the Federal lawsuit in December
 6 of 2011.
 7 MR. LILIEN: When he claims
 8 that you were stealing and told
 9 your employees at Smile Train you
 10 were stealing, what was he
 11 referring to?
 12 THE WITNESS: He was lying.
 13 MR. LILIEN: What were the
 14 allegations?
 15 THE WITNESS: Oh, that was
 16 it. He was saying I was stealing.
 17 In the arbitration, he testified
 18 for two days. He told the
 19 arbitrator, you know, I gave
 20 10 million to Smile Train and only
 21 4 million ended up -- I gave to
 22 Operation Smile and only 4 million
 23 ended up there and Mullaney stole
 24 that money.
 25 He said that in his

1 BRIAN MULLANEY - VOLUME I
 2 testimony, and the arbitrator
 3 wrote it in his decision. He
 4 just -- he's -- I don't need to
 5 tell you about him.

6 MR. LILJEN: This is
 7 Operation Smile, the 10 million
 8 that you are referring to?

9 THE WITNESS: Yes, he made a
 10 pledge of 10 million. He never
 11 gave them that money. So he said
 12 that and a lot of bad things about
 13 me, and any one of my friends -- I
 14 worked with these people for
 15 10 years -- to talk to me, they
 16 had to leave the office because
 17 they were listening in on phone
 18 calls.

19 He brought in all of his
 20 employees. They started going
 21 through everyone's direct mail and
 22 reading who they are talking to
 23 and stuff. They brought in a
 24 high-end surveillance company to
 25 put cameras everywhere in the

1 BRIAN MULLANEY - VOLUME I
 2 so I said I didn't want to do that.
 3 So that was the end of him.
 4 And then I just was busy trying to set
 5 up WonderWork and raising money for it
 6 and running around doing that.

7 MR. LILJEN: Who represented
 8 you after you fired the Proskauer
 9 lawyer?

10 THE WITNESS: The next
 11 lawyer -- I have had like ten --
 12 was Jones Day for the Federal
 13 lawsuit.

14 BY MR. CURCHACK:

15 Q Now, are the state suits
 16 still going on?

17 A No, they were -- I wasn't
 18 even aware of them.

19 Q So they've never been
 20 settled, but --

21 A Yeah, they are. With the
 22 Federal lawsuit, they were all wiped
 23 away.

24 Q Federal lawsuit settlement
 25 settled everything?

1 BRIAN MULLANEY - VOLUME I
 2 middle of the night so none of the
 3 employees would know it, to see
 4 who they are talking with, meeting
 5 with.

6 It was horrible. Everyone
 7 was scared to death.

8 BY MR. CURCHACK:

9 Q Okay.

10 So I take it you had counsel
 11 at the time in response to this?

12 A Yeah.

13 Q Who was your counsel?

14 A Well, when they stopped
 15 paying me -- they didn't pay me the
 16 grant. They didn't pay me -- I got a
 17 human resource labor lawyer from
 18 Proskauer.

19 Q Hm-hm.

20 A So he said this merger is
 21 great. They will give you whatever
 22 you want. Just tell Wang you helped
 23 to do the merger, and they will give
 24 you \$2 million to walk away. But I
 25 spent 10 years building this charity,

1 BRIAN MULLANEY - VOLUME I

2 A Yeah, and I got a release
 3 and they got a release but they
 4 refused to include England, so they
 5 got done -- the state lawsuits -- they
 6 sued me in the Federal thing. That
 7 took six months and cost a ton of
 8 money.

9 When that was all tied up,
 10 he launched the lawsuits in London
 11 against me.

12 Q The Smile Train UK lawsuits?

13 A Yes.

14 Q And what happened to those?

15 A In the UK, we were raising
 16 \$18 million a year out of a P.O. Box.
 17 We had no office and no staff. The
 18 auditor said where is this money
 19 coming from? Who is doing all the
 20 work? We were doing all the work in
 21 New York.

22 So the auditors allocated
 23 one-third of our highest three paid
 24 employees to Smile Train UK and it was
 25 deducted from our pay in the US and

1 BRIAN MULLANEY - VOLUME I
 2 wired to us once or twice a year from
 3 the UK.

4 The auditors knew about it.
 5 We did it for six years. It's -- a
 6 lot of multi-nationals do this. So I
 7 had payroll come into me. He went to
 8 the UK government and he said I was a
 9 consultant that finagled my way onto
 10 the UK board and I was stealing all
 11 that money.

12 And to do that, he knocked
 13 everyone off the board, including me,
 14 and replaced them all with his friends
 15 and got them to do the lawsuit and I
 16 had to defend it. And to receive
 17 compensation as a board member, you
 18 have to do certain things, and we did
 19 not do the paperwork because our
 20 counsel in London didn't tell us, so
 21 we didn't know.

22 So the Barrister who signed
 23 the thing said, I am really sorry.
 24 You got to pay all this money back,
 25 but you have a suit against New York

1 BRIAN MULLANEY - VOLUME I
 2 paid by the UK was money --
 3 A It was out of my New York
 4 paycheck.

5 Q So it wasn't additional
 6 compensation?
 7 A Uh-uh.
 8 Q Did you actually receive the
 9 money?

10 A Yes, I received the money
 11 and paid taxes on it and then --

12 Q Here or there?
 13 A Here.
 14 Q Okay.

15 A And then had to pay it all
 16 back, plus their legal fees.

17 Q Okay.
 18 A It was horrible.

19 Q Who were the other -- you
 20 said the top three officers.

21 A Yeah. It was Priscilla Ma,
 22 who was like the chief marketing
 23 officer, and DeLois Greenwood, who was
 24 the chief operating officer.

25 They went to DeLois and said

1 BRIAN MULLANEY - VOLUME I
 2 because it's income that they owe you.
 3 And Rob Smith in Smile Train board
 4 meeting said, we owe Brian this money.
 5 Let's just pay him. And Wang said,
 6 no, let him sue us for it.

7 It cost me a great deal of
 8 time and anguish.

9 MR. LILIEN: What were you
 10 compensated as a board member?

11 THE WITNESS: I wasn't paid
 12 as a board member. I was paid as
 13 an employee in New York doing
 14 marketing work for the UK.

15 MR. LILIEN: I see.

16 THE WITNESS: So the top
 17 three paid officers had one-third
 18 of their pay deducted from the New
 19 York pay and they went to London
 20 and said it was incremental money
 21 and I was stealing.

22 It was typical Wang. It was
 23 a nightmare.

24 BY MR. CURCHACK:

25 Q So the money that you were

1 BRIAN MULLANEY - VOLUME I
 2 you see what we are doing to Brian.
 3 We won't sue you if you vote these
 4 people on the Smile Train Canada board
 5 or else we will crush you.

6 So I am still on the
 7 sponsoring Canada board.

8 Q What is the sponsoring
 9 Canada board?

10 A There were all these boards
 11 around the world for Smile Train.

12 Q DeLois was on those boards?

13 A Yeah.

14 MR. LILIEN: What was the
 15 relationship between the
 16 countries -- the chapters -- what
 17 way were they affiliated with New
 18 York?

19 THE WITNESS: They were
 20 directly controlled by New York,
 21 established by then. They weren't
 22 independent at all. It was all
 23 Wang's friends, and they reported
 24 to New York, and all the money got
 25 sucked out of the UK and went to

1 BRIAN MULLANEY - VOLUME I
 2 New York.
 3 MR. LILIEN: So these are
 4 advisory boards.
 5 THE WITNESS: No. You
 6 needed a board in the UK, so we
 7 had -- you know, legally, and we
 8 have a good law firm then, you
 9 know, and we had a good 10 years
 10 with it.
 11 But then he came along and
 12 saw it as another opportunity.
 13 MR. LILIEN: What I'm asking
 14 is, in the individual countries,
 15 were these separate corporations,
 16 separate entities, or were these
 17 programs or parts of the US
 18 entity?
 19 THE WITNESS: They were a
 20 separate legal entity --
 21 MR. LILIEN: Okay.
 22 THE WITNESS: -- controlled
 23 by New York.
 24 BY MR. CURCHACK:
 25 Q So how long did this

1 BRIAN MULLANEY - VOLUME I
 2 A No, it was Surgery for the
 3 Poor.
 4 Q Okay.
 5 When did Surgery for the
 6 Poor get organized?
 7 A Right after I walked out the
 8 door of Smile Train in October of
 9 2010. I hired a lawyer and initiated
 10 the process to get a -- set up a
 11 501(c)(3).
 12 Q Okay.
 13 And what was the -- what was
 14 the purpose of WonderWork?
 15 A The mission?
 16 Q I'm sorry, Surgery for the
 17 Poor.
 18 A The mission was to take the
 19 successful strategy and business model
 20 that we built of empowering local
 21 doctors and local surgeons, which was
 22 been very successful, and bring that
 23 to even larger global health problems,
 24 such as clubfoot, burns and blindness.
 25 Q And has that always been the

1 BRIAN MULLANEY - VOLUME I
 2 litigation go on before it was finally
 3 resolved?
 4 A Which litigation; the
 5 Federal?
 6 Q The Federal.
 7 A I think that was filed in
 8 December 2012, I believe.
 9 Q Okay.
 10 A Yeah, because -- I think it
 11 was December 2012. Then we settled it
 12 in June of the following year. We
 13 settled it because the magistrate told
 14 me that it would cost us 2 to
 15 \$3 million to litigate.
 16 Q That is the -- okay.
 17 A The Federal.
 18 Q US Federal case?
 19 A Yeah.
 20 Q Okay.
 21 Let's move to the
 22 establishment of WonderWork.
 23 A Okay.
 24 Q When -- the initial name of
 25 WonderWork was not WonderWork, was it?

1 BRIAN MULLANEY - VOLUME I
 2 mission of the organization?
 3 A Well, we included a hole in
 4 the heart and water in the brain
 5 originally, but six months later we
 6 did some test mailings with donors and
 7 they didn't respond well to those
 8 appeals, so then we scaled it back to
 9 focus on just three causes.
 10 Q Okay.
 11 A Number of the mailings
 12 that I have seen when you signed them,
 13 you say co-founder.
 14 Who are the other founders?
 15 A I know. People asked me
 16 about that. I do that because there's
 17 no such thing called as co-founder
 18 syndrome. I was keeping it open
 19 because I thought of a few people who
 20 might join me and become a co-founder
 21 and I never really got around to
 22 inviting anyone, so I don't have a
 23 co-founder.
 24 Q At some point, I believe,
 25 the WonderWork board -- just for the

1 BRIAN MULLANEY - VOLUME I
 2 record, I am going to use the word
 3 "WonderWork," and it mean Surgery for
 4 the Poor or WonderWork, depending on
 5 what was in place.
 6 Let me ask this foundation
 7 question.
 8 Is there any reason why
 9 using one name or the other would be
 10 inaccurate?
 11 In other words, was there
 12 some period of time when they overlap?
 13 A No.
 14 Q Okay.
 15 I know at some point, the
 16 WonderWork board of directors passed a
 17 resolution to indemnify you for your
 18 legal fees in connection with
 19 Smile Train.
 20 A Yeah.
 21 Q Do you recall that?
 22 A Vaguely, yes.
 23 Q Okay.
 24 And the resolution, I will
 25 state for the record -- the document

1 BRIAN MULLANEY - VOLUME I
 2 policy for that?
 3 A An indemnity policy? You
 4 mean D&O insurance?
 5 Q Yes. Yes.
 6 A Not to my knowledge, no.
 7 Q Do you know why a claim
 8 wasn't made?
 9 A For our legal bills with the
 10 Smile Train thing?
 11 Q Yes.
 12 A I believe I tried to get a
 13 claim, but they said the accusations
 14 were fraud and that's not covered by
 15 D&O insurance.
 16 Q You mentioned [REDACTED]
 17 as someone you met while you were --
 18 A I never met him, actually.
 19 Q Tell me about your
 20 relationship with him.
 21 A He -- I used to correspond
 22 with him and send letters. So he was
 23 a reclusive Swiss billionaire who
 24 owned a company called Uccel that
 25 Charles Wang bought and he told --

1 BRIAN MULLANEY - VOLUME I
 2 is in the record -- had a cap of
 3 \$150,000.
 4 A Yeah.
 5 Q Do you recall what the
 6 actual legal fees were?
 7 A Well, what happened was I
 8 got the lawsuit and it named me
 9 individually. It was for actions that
 10 I had taken to benefit WonderWork.
 11 I raised millions of dollars
 12 doing that, so I went to the board and
 13 said they are suing me for raising --
 14 I know this money went to me.
 15 They said okay. We will
 16 indemnify. The next week or month,
 17 they put WonderWork as a defendant.
 18 It became a non-issue and there was
 19 haven't a cap and I never received any
 20 money for legal fees.
 21 So we hired Jones Day, and
 22 they represented WonderWork and me.
 23 Q Okay.
 24 Do you know whether any
 25 claim was made against the indemnity

1 BRIAN MULLANEY - VOLUME I
 2 Wang don't tell him don't sell your
 3 stock. Keep it. And he kept it and
 4 became billions -- worth billions.
 5 He felt a real debt to
 6 Charles Wang. So when Wang started
 7 Smile Train, he said I am going to
 8 give him a million shares of stock.
 9 Will you please match mine. Walter
 10 said yes, because he owed Charles, you
 11 know.
 12 So I would write to him and
 13 say we are starting Smile Train and
 14 thank you. And he would write me back
 15 letters saying -- you know, he's a
 16 very accomplished, self-made billion,
 17 worth 6, 7 billion.
 18 He said of all the things I
 19 have done in my life, starting
 20 Smile Train is what I am most proud
 21 of. So I invited him to China to meet
 22 President Bush and the president of
 23 China once.
 24 He said I am too old, but
 25 can my son come, so his son [REDACTED]

1 BRIAN MULLANEY - VOLUME I
 2 came on that trip, and I have been
 3 friendly with him ever since.

4 Q At some point, did you
 5 approach -- at any time while you were
 6 at Smile Train, were you aware of any
 7 issues between [REDACTED]
 8 [REDACTED], and Mr. Wang?

9 A Well, there was the issue of
 10 CA suing Wang for \$600 million.

11 Are you talking about that?

12 Q Well, were the [REDACTED] on
 13 the other side of that --

14 A The [REDACTED] are the largest
 15 shareholders of CA. They conducted a
 16 board of investigation that you guys
 17 should look at that says Wang
 18 masterminded the whole thing, and he
 19 created a culture of fear and
 20 betrayal.

21 Eight people went to prison.
 22 And Wang used to tell me, because I
 23 became friendly with [REDACTED],
 24 he said you should tell him they
 25 should drop their lawsuit for me

1 BRIAN MULLANEY - VOLUME I
 2 Recommenced at 3:09.)
 3 BY MR. CURCHACK:

4 Q Back on the record.

5 Two other questions before
 6 we move past Smile Train.

7 At one point, did you learn
 8 that a company called Infogroup had
 9 been told they couldn't do work for
 10 WonderWork?

11 A Yes.

12 Q And tell us about that.

13 A Well, the first week we
 14 opened our office at WonderWork, TMT
 15 called us up and quit because Wang --
 16 Charles Wang made them quit.

17 And then he went on to get
 18 Infogroup to quit and then two weeks
 19 ago, he got -- he keeps doing it. He
 20 got our Cajun company DMP, who I
 21 worked with for 20 years, quit.

22 Q And how did you find out
 23 that this happened?

24 A Well, Ron Bell called me at
 25 TMT and said Wang put a gun to my

1 BRIAN MULLANEY - VOLUME I
 2 because they are paying my law fees
 3 and I am going to drive them up into
 4 hundreds of millions of dollars.

5 The legal fees were \$500
 6 million.

7 Q Other than the million
 8 shares of CA stock, did the [REDACTED]
 9 ever contribute anything to
 10 Smile Train?

11 A Oh, yes. They were
 12 incredibly loyal donors. They gave
 13 \$50 million in total. 35 million
 14 initial gift, and then 5 million a
 15 year after that.

16 Q When did that stop?

17 A That stopped when I left.

18 Q Okay.

19 Did you approach them about
 20 giving money to your new organization?

21 A Yes.

22 Q And they agreed to do that?

23 A Yes.

24 (Whereupon a Recess
 25 Commenced at 2:51 and Testimony

1 BRIAN MULLANEY - VOLUME I
 2 head. They told us under no uncertain
 3 terms.

4 Q Okay.

5 MR. LILIEN: When did that
 6 happen?

7 THE WITNESS: That
 8 happened -- we were in our
 9 brand-new offices, first day of
 10 the first week, which was
 11 September or October 2011.

12 And then Digital Pulp, he
 13 told them they couldn't come over.
 14 That was a web firm we wanted to
 15 use. We couldn't use them.

16 MR. LILIEN: After that
 17 period, did you ever work with
 18 them?

19 THE WITNESS: No.

20 BY MR. CURCHACK:

21 Q Okay.

22 A We did work with TMT
 23 afterwards. It was weird. This was
 24 the Help -- to HelpMeSee account. We
 25 hired them -- actually, we hired them

1 BRIAN MULLANEY - VOLUME I
 2 before we did. They came back, and it
 3 was really mysterious. We couldn't
 4 understand why.

5 I think it was to spy on us
 6 or something, because then they quit
 7 again and then had to find another
 8 firm.

9 We paid TMT six-hundred
 10 grand a year when I was there running
 11 Smile Train. Today they make
 12 1.8 million under Wang.

13 Q Okay.

14 Where did you meet Hana
 15 Fuchs?

16 A I met Hana Fuchs at
 17 Smile Train before I took over. She
 18 came from Sesame Street. Boris -- I
 19 forget his last name -- brought her
 20 over.

21 Q And did you know DeLois
 22 Greenwood before?

23 A Yes, I met DeLois Greenwood
 24 way back in '94 when I was merging my
 25 charity into Operation Smile.

1 BRIAN MULLANEY - VOLUME I
 2 evolving of the direct mail, you know,
 3 things like that.

4 Q You mean the business plan
 5 model?

6 A Yeah.

7 Q How to raise funds?

8 A Yeah. Direct mail has
 9 changed a lot since I was at
 10 Smile Train. It doesn't work as well
 11 as it used to because a lot of the
 12 donors have died.

13 It's a demographic thing.
 14 So we have been forced to kind of
 15 pivot and we have been trying to
 16 evolve our mail program from a
 17 Smile Train, mail a hundred million
 18 people, to mail like 10 million but
 19 make them high-end people, and stuff
 20 like that.

21 Q Okay.

22 A But I don't know if that's
 23 the mission.

24 Q By "mission," I mean, you
 25 know, the --

1 BRIAN MULLANEY - VOLUME I

2 Q So that was before
 3 Smile Train was even --

4 A Yes.

5 Q -- around?

6 When did you meet Karen
 7 Lazarus?

8 A Karen Lazarus used to be my
 9 assistant when I had my ad agency,
 10 Schell Mullaney. We have been
 11 together for 18 years.

12 Q Who is responsible for
 13 developing the mission of WonderWork?

14 A Well, the board is
 15 governance, so they have ultimate say
 16 on what we do. And, you know, you say
 17 developing -- I mean, we had the
 18 mission from the beginning, but
 19 changes to it would be the board or
 20 governance.

21 Q Other than dropping the hole
 22 in the heart and hydrocephalous, have
 23 there been any changes in the mission?

24 A Well, that's the program
 25 mission. There have been slight

1 BRIAN MULLANEY - VOLUME I

2 A The reason for being?

3 Q The reason for being, yes.

4 A No, our reason for being is
 5 to do surgeries for people who don't
 6 have access to it.

7 Q Let me mark as an exhibit --
 8 at some point, did WonderWork apply
 9 for -- I don't know if the right word
 10 is certification by the Better
 11 Business Bureau?

12 A Yes.

13 Q And whose decision was it to
 14 do that?

15 A Well, we always wanted it
 16 and it was kind of a no-brainer. It
 17 wasn't really a decision, but we
 18 couldn't do it until we had five board
 19 members. So the meeting that we had
 20 five board members -- I think that was
 21 the one requirement we didn't fulfill.
 22 We raced out and applied for it.

23 Q And when was that?

24 A Probably two years ago this
 25 December, I am thinking. I don't

1 BRIAN MULLANEY - VOLUME I
 2 know.
 3 Q December 2015, roughly?
 4 A Yes, I think.
 5 Q Okay.
 6 A I don't know exactly.
 7 MR. CURCHACK: I would like
 8 to ask the reporter to mark a
 9 document that's called "WonderWork
 10 Measuring Effectiveness Policy."
 11 It bears production number
 12 0070025, and ask you if you recall
 13 ever seeing this.
 14 (Exhibit 1 is Marked.)
 15 THE WITNESS: I don't know
 16 if I have seen it.
 17 By MR. CURCHACK:
 18 Q Okay.
 19 I believe this is a part of
 20 the Better Business Bureau
 21 application.
 22 A Oh.
 23 Q One of the requirements
 24 was -- let me ask a different question
 25 first.

1 BRIAN MULLANEY - VOLUME I
 2 meeting.
 3 MR. CURCHACK: Okay.
 4 I would like to then mark as
 5 the next exhibit an e-mail from
 6 you to Karen, Hana and DeLois
 7 dated December 18, 2011. It bears
 8 production number 0246343.
 9 (Exhibit 2 is Marked.)
 10 By MR. CURCHACK:
 11 Q Do you recall sending this
 12 e-mail?
 13 A Can I review it?
 14 Q Sure.
 15 A (Reviewing.) Yes, I
 16 remember it.
 17 Q Okay.
 18 If you look at the last
 19 paragraph -- maybe next-to-last
 20 paragraph on the last page, it says,
 21 "As a small token of appreciation...I
 22 am going to give all of you a \$15,000
 23 year-end bonus."
 24 Do you know whether that
 25 bonus ever got paid?

1 BRIAN MULLANEY - VOLUME I
 2 Who was responsible for
 3 pursuing that Better Business Bureau
 4 application?
 5 A You mean filling out the
 6 form?
 7 Q And dealing with them as
 8 well.
 9 A I believe Hana did it or
 10 Karen.
 11 Q Do you have any involvement
 12 in it, in the application process?
 13 A No, other than saying please
 14 do it as quickly as you can.
 15 Q Okay.
 16 Do you know whether the
 17 board of directors ever adopted this
 18 measuring effectiveness policy?
 19 A I don't think we needed to.
 20 We measure our effectiveness at every
 21 single board meeting three times a
 22 year. We do all of these things.
 23 Q Okay.
 24 A So I don't know, but this is
 25 everything that we do at every board

1 BRIAN MULLANEY - VOLUME I
 2 A No idea.
 3 Q Okay. Okay.
 4 Who was the original board
 5 of WonderWork?
 6 A It was Ravi Kant, Ted Dysart
 7 and myself.
 8 Q Was there a chairman?
 9 A No.
 10 Q Okay.
 11 (Exhibit 3 is Marked.)
 12 THE REPORTER: 3.
 13 BY MR. CURCHACK:
 14 Q This is an e-mail from Karen
 15 Lazarus to Brian Mullaney dated
 16 February 12, 2016, production number
 17 0070023, and it's six pages.
 18 Does this refresh your
 19 recollection at all about your
 20 involvement in the Better Business
 21 Bureau application?
 22 A (Reviewing.) I guess so.
 23 Q You guess so or it does?
 24 A (Reviewing.) Yes. She ran
 25 this by me, and I gave her feedback or

1 BRIAN MULLANEY - VOLUME I
 2 approved it.
 3 Q Okay.
 4 Do you recall having any --
 5 any of the comments that you made?
 6 A (Reviewing.) So where are
 7 my comments; in the red?
 8 Q I am not sure. If you don't
 9 recall, that's fine. We will move on.
 10 A I will move onto my e-mail.
 11 Okay. Sorry.
 12 (Reviewing.) So, yeah,
 13 these are my comments.
 14 MR. TRIVIGNO: When you say
 15 "these," there's two places,
 16 right, just to make sure?
 17 THE WITNESS: Well, I am
 18 reading from Brian Mullaney.
 19 BY MR. CURCHACK:
 20 Q So looking at page 3 where
 21 it says, "Thanks. My comment is
 22 below," is that what you are referring
 23 to?
 24 A Yes, in the caps.
 25 Q Okay.

1 BRIAN MULLANEY - VOLUME I
 2 A No.
 3 Q Okay.
 4 I would like to show you --
 5 MR. CURCHACK: -- mark as
 6 the next exhibit an e-mail number
 7 0254693.
 8 (Exhibit 4 is marked.)
 9 THE REPORTER: Exhibit 4.
 10 BY MR. CURCHACK:
 11 Q It's another e-mail thread.
 12 The first one is from you to Karen
 13 dated February 2nd. Then look at the
 14 second page.
 15 A Right. Second page.
 16 Q It's an e-mail from you to
 17 Karen.
 18 A (Reviewing.)
 19 Q Go to the third line
 20 beginning "Ravi is treasurer."
 21 Can you read that, please?
 22 A Yeah. "Ravi is treasurer,
 23 JJ Coneys is the lead director and
 24 secretary and I am chairman and CEO."
 25 Q So at some point you did

1 BRIAN MULLANEY - VOLUME I
 2 If you look --
 3 A Well, I didn't type we
 4 didn't -- (Reviewing.) -- yeah, not --
 5 I misspoke. Not -- page 3, that's my
 6 e-mail. Here are my comments --
 7 (Reviewing.) Okay.
 8 Q If you look at page 4 of
 9 the --
 10 A Yeah.
 11 Q There's a reference to page
 12 4.
 13 A Yes.
 14 Q And it says, "Where does it
 15 say that? And if that is so, I am not
 16 the chairman as I wasn't during the
 17 last fiscal year."
 18 Do you see that?
 19 A Right.
 20 Q So is that you saying to her
 21 that you were not the chairman during
 22 the fiscal year before this?
 23 A (Reviewing.) Yes.
 24 Q But did you at some
 25 subsequent point become the chair?

1 BRIAN MULLANEY - VOLUME I
 2 become the chairman of the board?
 3 A No. I found out it was
 4 illegal for me to be the chairman.
 5 Q Illegal in what way?
 6 A I think it is one of the BBB
 7 requirements as CEO, I cannot be
 8 chairman of the board.
 9 Q Okay.
 10 A So I found that out in or
 11 around that time. I was going to be
 12 chairman because I thought it was bad
 13 that we didn't have one, and -- but I
 14 never became it.
 15 MR. LILIEN: So did the
 16 board vote you in as chairman?
 17 THE WITNESS: We discussed
 18 it on the phone.
 19 MR. LILIEN: But if you look
 20 at the first -- if you look at the
 21 page --
 22 THE WITNESS: With the
 23 minutes?
 24 MR. LILIEN: Yes, the first
 25 page. It's 254693.

BRIAN MULLANEY - VOLUME I

THE WITNESS: Yeah.

MR. LILIEN: This is your direction to Karen to write minutes --

THE WITNESS: Right.

MR. LILIEN: -- for the meeting based on your taking the minutes at the meeting.

THE WITNESS: Yeah.

MR. LILIEN: And one of the items is that you were -- it appears you were appointed to be service chair.

THE WITNESS: Yeah, I know it was a discussion we had. We didn't have a resolution, but I found out that I could not serve, so I did not become chairman.

I can find, I think, another e-mail explaining that to JJ and the other guys, but I never became chairman.

BY MR. CURCHACK:

Q And no one else became

BRIAN MULLANEY - VOLUME I
that to solve bigger global health problems such as clubfoot, blindness and burns and we were going to use the same direct mail model to finance that. It was like Smile Train 2.0.

Q When I said business plan, I was referring to the method of operations.

So it was direct mail, primarily?

A Yes.

Q Has that business plan ever changed?

A Yes, it's evolved. Our direct mail, we started out spending huge amounts on acquisition and it did not work as well as when we were at Smile Train, so we had to kind of pivot and reduce -- the original plan was five causes, and I was trying to raise \$5 million for each cause and actually was very close to it.

And then the whole Charles Wang thing with Smile Train blew up

BRIAN MULLANEY - VOLUME I
chairman?

A No one else became chairman, no, but JJ is the lead and the director.

MR. LILIEN: So since WonderWork was formed, has anyone served as chairman?

THE WITNESS: No.

MR. LILIEN: Who runs board meetings?

THE WITNESS: I do.

BY MR. CURCHACK:

Q Okay.

What was the business plan for WonderWork initially?

A It came from Smile Train. I can find it for you and send it to you, if you'd like, if you don't have it.

Q Describe it for me.

A The business plan was to take this successful model of empowering local doctors and exactly what we did to Smile Train and import

BRIAN MULLANEY - VOLUME I
and I lost a lot of donations, as you can read in one of these things. So that killed us. So we trenched from that and we said, well, we have enough capital to do three causes: Burns, clubfoot and blindness.

But as we did that, we found out that donors responded better to blindness than other causes, so we kind of evolved that and we also lost a lot of money on the lawsuits with Wang.

So from our grand plans of seven years ago, we are not doing five causes. We are doing primarily blindness, because it is the cheapest and donors like it the best and you can help ten times the patients as per burns or per clubfoot.

Q That's because -- why can you help ten times as many?

A Because you can restore an adult's eyesight for 25 bucks and it costs 300 to do a burn surgery or 250

1 BRIAN MULLANEY - VOLUME I
 2 to do a clubfoot and a child is about
 3 \$300 cost. We make a contribution of
 4 150.

5 Q Most of the pictures that I
 6 have seen on the promotions for
 7 WonderWork or one of the causes are
 8 pictures of children, and I understand
 9 that clubfoot is primarily a child --

10 A Right.

11 Q -- situation.

12 I am not sure about the burn
 13 patients. I will come back to that.

14 Are most of the blind
 15 patients, children or adults?

16 A No, 90 percent adults.

17 Q Why do you emphasize
 18 children in the campaigns?

19 A Because we emphasize with
 20 photos, but when I write all the copy
 21 and I always say children and adults,
 22 children and adults. We do have some
 23 adults in the brochures.

24 But people have much more
 25 empathy for children than adults.

1 BRIAN MULLANEY - VOLUME I
 2 [REDACTED] all ran away, so we were
 3 struggling for -- to raise money and
 4 HelpMeSee came along and they wanted
 5 me to work for them or work with them,
 6 but then they said, oh, I -- I said I
 7 am looking five gals or guys with five
 8 million apiece.

9 It started out they were
 10 going to us a donation, then a loan,
 11 and then it deteriorated to a service
 12 agreement with them.

13 Q Who -- if I asked you who
 14 was behind HelpMeSee, what would your
 15 answer be?

16 A Two people: Jim Ueltschi
 17 and his lieutenant, Mohan Thazhathu.

18 Q And how did you meet them?

19 A They approached me when they
 20 were at Orbis and asked me to give
 21 marketing advice and meet with their
 22 board of directors.

23 Q Who is Orbis?

24 A Orbis was a huge blindness
 25 charity started by Ueltschi's father.

1 BRIAN MULLANEY - VOLUME I
 2 That's why we use kids.

3 Q What was the relationship --
 4 what role did the relationship with
 5 HelpMeSee play in the business plan
 6 for Surgery for the Poor when it was
 7 first set up?

8 A None.

9 Q Okay.

10 When Surgery for the Poor
 11 was established, did it have a
 12 relationship with HelpMeSee?

13 A No.

14 Q Did it ever have a
 15 relationship with HelpMeSee?

16 A Yeah, a year after I kind of
 17 developed the business plan.

18 Q And how did that come to
 19 play?

20 A Well, again, we were
 21 struggling because we had Charles
 22 Wang, the front page of The New York
 23 Times, the thing. So [REDACTED]
 24 [REDACTED] was going to give me
 25 five million and [REDACTED]

1 BRIAN MULLANEY - VOLUME I

2 Q So sometime in 2011 -- late
 3 2011 time frame, we are talking, or
 4 early 2012?

5 A Oh, no. 2009, 2010.

6 Q This is while you are still
 7 at Smile Train?

8 A Yes.

9 Q So did they want to work
 10 with you, or did they want to work
 11 with Smile Train?

12 A They wanted a lot of things.
 13 First of all, they wanted me to give
 14 them marketing advice because they
 15 thought the Orbis fundraising people
 16 were bad.

17 They thought -- they admired
 18 what we had done with direct mail.
 19 They asked me to come in and I went to
 20 a board meeting and presented them
 21 with our results.

22 That was one thing. Then
 23 they invited me to go to Orbis. I did
 24 all this for free for them. I gave
 25 them free stuff for a year.

1 BRIAN MULLANEY - VOLUME I

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 20 a board meeting and presented them
 21 with our results.

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 23 they invited me to go to Orbis. I did
 24 all this for free for them. I gave
 25 them free stuff for a year.

1 BRIAN MULLANEY - VOLUME I

2 Then they asked me to come
 3 in and look at the marketing
 4 fundraising plans that their staff had
 5 created and I did that. And then I
 6 shared with them that we were thinking
 7 of expanding the program and stuff,
 8 and so they got all excited and
 9 submitted a grant proposal to
 10 Smile Train, asking us for money,
 11 which we looked at.

12 It was unsolicited, but then
 13 we turned it down and we said, Wang is
 14 shutting down the blindness; we are
 15 not giving you any money for
 16 blindness.

17 MR. LILIEN: Did your idea
 18 of expanding Smile Train and the
 19 blindness occur before, during or
 20 after your interactions with them
 21 regarding fundraising advice?

22 THE WITNESS: Oh, after --
 23 my idea occurred before. I have
 24 that -- I don't know. You
 25 probably have it. I have the

1 BRIAN MULLANEY - VOLUME I
 2 play golf with him next time
 3 you're down. I said sure. So I
 4 got to know him and met him, you
 5 know.

BY MR. CURCHACK:

Q So they approached -- did
 you have an employment agreement with
 Smile Train?

A I did, yes. It was expired,
 but I did at the beginning.

Q Did it have any restrictions
 on competition?

A No, I don't believe it did.

Q Did the other members of the
 board of Smile Train know that you
 were providing this free advice to
 Orbis initially while you were still
 working at Smile Train?

A It's something -- I met with
 charities all the time and I still do
 and give them free advice. I did it a
 month ago.

MR. LILIEN: Was there any
 work product that came out of

1 BRIAN MULLANEY - VOLUME I
 2 structure from 2007, 2008 of an
 3 umbrella company that could run
 4 the street programs to help
 5 people.

6 MR. LILIEN: To the best of
 7 your recollection, do they call
 8 you out of the blue, or do they
 9 contact you through someone else?

10 THE WITNESS: No, I used to
 11 go to these CEO dinners for heads
 12 of charities. It met like every
 13 six months from some consulting
 14 group. I forgot the name. So I
 15 met Mohan at one of those. And I
 16 think it was actually at
 17 Smile Train. I hosted it. We all
 18 took turns hosting it. So Save
 19 the Children, UNICEF. It was a
 20 great things. You talk about all
 21 your troubles.

22 I met Mohan at that. He
 23 said I want you to meet Ueltschi.
 24 My father is in Vero Beach where
 25 Ueltschi is. He said will you

1 BRIAN MULLANEY - VOLUME I
 2 those discussions?

THE WITNESS: For Orbis?

MR. LILIEN: Any -- either
 side.

THE WITNESS: You mean like
 a direct mail letter or something?

I told them to hire Ron Bell
 because I wasn't in a position to
 do direct mail. I tried to help
 them. They met with him and hired
 him but no, nothing.

Our business wasn't into
 direct mail. And they fired Mohan
 and threw Ueltschi off the board
 six to eight months after I met
 them.

BY MR. CURCHACK:

Q And is that when they set up
 HelpMeSee?

A Yes. So I helped them
 there. Wang said you are not doing
 blindness. That's that. We had done
 the test in The New York Times and
 stuff, so I sold him the logo for a

1 BRIAN MULLANEY - VOLUME I
 2 dollar in the name HelpMeSee.
 3 Q You sold HelpMeSee, the
 4 logo?
 5 A And the name.
 6 Q When you say "you," do you
 7 mean you --
 8 A Smile Train owned it, so
 9 Smile Train did a letter. Wang wanted
 10 it shut down. We gave him that. We
 11 distributed the funds we raised to
 12 blindness charities. I don't remember
 13 which ones.
 14 Q And after that \$1 sale, what
 15 was your next contact with HelpMeSee?
 16 A Well, it was -- it was very
 17 fluid because Smile Train was blowing
 18 up. Wang fired the whole staff. It
 19 was in The New York Times. He hadn't
 20 sued me yet, but it was just a mess.
 21 He was in The Times blaming
 22 me for the merger falling through. So
 23 they were busy setting up HelpMeSee
 24 and I was busy trying to set up my
 25 next move, trying to figure out how to

1 BRIAN MULLANEY - VOLUME I
 2 A Well, my dream was to set up
 3 Surgery for the Poor and pick five
 4 solvable things that was simple,
 5 inexpensive surgery like clefts and
 6 get one wealthy person who cared about
 7 that particular thing.
 8 So they cared a lot about
 9 blindness. So I said blindness would
 10 be your thing, but you would be the
 11 patron or major donor. It would be
 12 our charity. And I would find someone
 13 else who cared about clubfoot and find
 14 somebody else who cared about burns.
 15 That was the goal, to raise
 16 \$25 million. I felt very short of
 17 that. I only raised 5 million. They
 18 were very stubborn. They had a
 19 different opinion. They wanted to do
 20 it their own way and looked at me at
 21 the end like some guy that's really
 22 good at raising money.
 23 Like I said, it went from a
 24 grant -- they said we will loan you
 25 five million. Interest rates are low.

1 BRIAN MULLANEY - VOLUME I
 2 do it, stuff like that.
 3 Q So after you set up Surgery
 4 for the Poor, did you reach out to
 5 them?
 6 Did they reach out to you?
 7 A Both. Both.
 8 Q And tell us about it.
 9 A Like I said, will you come
 10 to New Jersey at the flight simulator
 11 place. I went there and gave a little
 12 pitch. You guys can have blindness.
 13 They gave me their pitch and stuff.
 14 It was, you know, an ongoing thing.
 15 Q Tell me about --
 16 A This is after I left
 17 Smile Train.
 18 Q Understood. But you're now
 19 at Surgery for the Poor --
 20 A That's just me in an empty
 21 cubicle, 34th Street.
 22 Q When you say you can have
 23 blindness -- you said -- I think you
 24 said to them you can have blindness.
 25 What does that mean?

1 BRIAN MULLANEY - VOLUME I
 2 We can loan it to you.
 3 They kind of kept teasing me
 4 for like a year and then it finally
 5 devolved into a services agreement
 6 that we ended up signing in August of
 7 that year.
 8 Q And that is the agreement
 9 that ultimately went into arbitration?
 10 A Yes.
 11 Q Who was the five million
 12 that you got? You said you only
 13 raised five million.
 14 A [REDACTED]
 15 Q And what was his cause?
 16 A Me, us. He knew DeLois,
 17 Hana, all of us. He was here in New
 18 York. When Wang fired them all, we
 19 met with them and said we want to take
 20 the plan that we developed at
 21 Smile Train and I ran to Switzerland
 22 right after I was -- left Smile Train
 23 to talk to him and he said we would
 24 help us.
 25 And we didn't have our tax

1 BRIAN MULLANEY - VOLUME I
 2 ID then, so we can't accept money, but
 3 it was [REDACTED].

4 Q Out of the five potential
 5 causes, did he have one --

6 A No, no.

7 Q -- he cared about
 8 particularly?

9 A No, he didn't care.

10 Q So WonderWork entered into a
 11 service agreement.

12 Did it enter into a similar
 13 service agreement with anyone else?

14 A No. We considered it. It
 15 was a nightmare, so no.

16 Q What was the nightmare?

17 A Well. That service
 18 agreement, they had a Skadden Arps
 19 lawyer on their side. We had no
 20 lawyer representing us in negotiating
 21 it.

22 They kept changing it and
 23 making it more penal, this that and
 24 the other thing. We at the end sent
 25 it to Greg Lam, our lawyer, and he

1 BRIAN MULLANEY - VOLUME I
 2 million dollars' worth of grant to at
 3 Smile Train did really good work,
 4 called me and asked if I would meet
 5 with his marketing guy. I forgot his
 6 name.

7 And I met with him and I
 8 showed him all of our direct mail.
 9 But I have done this with a gazillion
 10 charities because I don't view them as
 11 competition.

12 I met with him. He said,
 13 yes, sign us up. We want you to do
 14 this for Mercy Ships. I told him we
 15 were restricted for six months with
 16 taking on other clients and we
 17 couldn't do it. And --

18 Q Restricted under the --

19 A The contract says it was
 20 exclusive for six months.

21 Q HelpMeSee?

22 A Yeah. I said we are
 23 restricted. The more we had the
 24 experience with HelpMeSee -- it was a
 25 really negative experience, horrible,

1 BRIAN MULLANEY - VOLUME I
 2 said [REDACTED]
 3 [REDACTED]

4 [REDACTED]
 5 So we called Ueltschi. We
 6 showed it to our non-profit lawyer
 7 Greg Lam, who is very respected out in
 8 Kansas City. I forgot the name of his
 9 firm, but really great non-profit guy.
 10 And Ueltschi said take it or leave it.
 11 Screw it. I am not changing a word.

12 We were anxious to get
 13 going, so we said, look, we have a
 14 year. They can't fire us for a year.
 15 Let's work our tail off, do the best
 16 we can and at worse, it will be a year
 17 we lose doing this, so --

18 Q And do you remember the
 19 other companies that you were --
 20 entities that you were considering
 21 working with?

22 A Well, Mercy Ships -- the
 23 cofounder of Mercy Ships,
 24 Don Stephens, who I had given a

1 BRIAN MULLANEY - VOLUME I
 2 so I said I don't think we are going
 3 to be able to do it and I urged them
 4 to hire Target Market Team, so we did
 5 not do that, no.

6 Q In this context, who is
 7 Perkins?

8 A Okay.
 9 Perkins -- I went to see
 10 Wyc Grousbeck, who owns the Celtics,
 11 and he has a son who is blind and a
 12 friend of mine knew him from Martha's
 13 Vineyard and I met with him and he has
 14 200 million in his charitable
 15 foundation with his father, a very big
 16 guy.

17 So he said, yeah, I like
 18 your business plan. I don't know. I
 19 like Smile Train. But maybe you could
 20 help me. Would you do me a favor and
 21 meet with two non-profits dearest to
 22 my heart? One was Perkins School for
 23 the Blind where his son goes and the
 24 other one was Mass. Eye and Ear. He
 25 put me in a cab that day and sent me

1 BRIAN MULLANEY - VOLUME I
 2 there.
 3 Q Okay.
 4 What are your
 5 responsibilities at WonderWork?
 6 A I am responsible for
 7 everything. We raise our money, meet
 8 our goals, keep our donors happy, do
 9 things by the book, and that our
 10 programs provide safe and quality
 11 surgeries for our target, which are
 12 extremely poor children and adults
 13 living in the poorest countries in the
 14 world.
 15 Q And have those
 16 responsibilities changed over the
 17 years at WonderWork?
 18 A No, same ones I had at
 19 Smile Train and same ones now.
 20 Budgets change.
 21 Q Are there regular staff
 22 meetings at WonderWork?
 23 MR. LILIEN: Off the record.
 24 (Whereupon a Recess
 25 Commenced at 3:48 and Testimony

1 BRIAN MULLANEY - VOLUME I
 2 developing country, you know, visiting
 3 a partner.
 4 Q Have you always lived in
 5 Boston?
 6 A You know, I grew up in
 7 Boston and when I got out of college,
 8 I went to New York for 30 years and
 9 just moved back four years ago.
 10 Q Okay.
 11 So other than these
 12 meetings, how does information flow
 13 within WonderWork?
 14 A E-mail and phone calls.
 15 Q Do you have a practice of
 16 recording notes when you're on phone
 17 calls?
 18 A No.
 19 Q Do you have any e-mail other
 20 than the WonderWork account?
 21 A Not that I use for business.
 22 Q Okay.
 23 I want to turn to direct
 24 marketing.
 25 (Whereupon a Discussion is

1 BRIAN MULLANEY - VOLUME I
 2 Recommenced at 3:51.)
 3 BY MR. CURCHACK:
 4 Q Are there regular staff
 5 meetings at WonderWork?
 6 A Yes.
 7 Q And who attends those?
 8 A Well, I am not there every
 9 week. So often they are weekly with
 10 DeLois, who is my COO, DeLois
 11 Greenwood, and then I will have a
 12 staff meeting -- we had more lately
 13 because of all this turmoil and stuff.
 14 We will have one with me, and we
 15 usually do a staff dinner in June, and
 16 a staff dinner at Christmas and stuff.
 17 Q By "turmoil," you are
 18 referring to the bankruptcy?
 19 A Yeah.
 20 Q If you are not in New York,
 21 where are you?
 22 A I live in Boston.
 23 Q And have you --
 24 A I travel quite a bit too, so
 25 either I am raising money or I am in a

1 BRIAN MULLANEY - VOLUME I
 2 Held Off the Record.)
 3 THE WITNESS: Can I explain
 4 something?
 5 So we are talking about
 6 blindness surgeries and one thing
 7 you should understand is, if you
 8 operate on a 70-year old woman who
 9 is blind and give her her eyesight
 10 back, you save her for five years
 11 of blindness. She dies at 75,
 12 around there.
 13 If you operate on a
 14 five-year old who is blind, you
 15 save them 70 years of blindness.
 16 So the adults are 90 percent or --
 17 or very high. But a child is
 18 worth three or four or five adults
 19 in terms of numbers of years saved
 20 of blindness.
 21 BY MR. CURCHACK:
 22 Q How do you define blindness?
 23 A Well, I don't define it.
 24 The medical people do. In America,
 25 it's 2200 is the definition of

1 BRIAN MULLANEY - VOLUME I
 2 blindness. The WHO is a different
 3 number. It's 3/60. It's about the
 4 same. But the thing about blindness
 5 is we are focused only on cataract
 6 blindness.

7 So once you have cataracts,
 8 they progress until you're blind. So
 9 in America, people get cataracts --
 10 very mild cataracts and they can't
 11 drive at night. They get surgeries,
 12 outpatient thing, but over there, they
 13 have had it for years and they have
 14 been going blind and they come to get
 15 help when they can't work or they
 16 can't farm, stuff like that.

17 A lot of the children who
 18 are born blind, they don't even know
 19 they are blind until they send them to
 20 school and realize they can't see the
 21 board or anything.

22 So it's a continuum and it's
 23 not you're blind or you are not.
 24 Blindness can mean anything from no
 25 light or dark or no hand movement.

1 BRIAN MULLANEY - VOLUME I
 2 Q Okay.
 3 Does anyone else provide
 4 input?
 5 A Yes.
 6 Q Who?
 7 A My staff. They say Brian,
 8 this number is wrong. This is an
 9 exaggeration. This -- and so we go
 10 back and forth until we arrive at
 11 something that people find it
 12 acceptable.

13 Q Who has the last word?
 14 A I do. Someone has to.
 15 Q What is the strategy that
 16 you use in developing the materials?

17 A The strategy -- my goal is
 18 to write a letter so that the reader
 19 feels they are with me in Bangladesh
 20 or Afghanistan or Somalia or wherever
 21 I am.

22 That's my goal and to be
 23 very intimate and honest with them and
 24 tell it like it is and not give a
 25 sanitized version, anything like that.

1 BRIAN MULLANEY - VOLUME I
 2 They actually use the words hand
 3 movement on some of the charts and
 4 stuff to being legally blind where
 5 you're just insanely nearsighted and
 6 it's blurry and you can't see.

7 Q But are the surgeries that
 8 you do on people who would meet the
 9 WHO standard of blindness?

10 A Yeah.

11 Q Okay.

12 Who develops the content for
 13 WonderWork-branded mailings?

14 When I say "WonderWork," I
 15 mean specifically WonderWork.

16 A You mean not 20/20/20?

17 Q Correct.

18 For our conversation, when I
 19 say "WonderWork," I will generally
 20 mean WonderWork itself, and I will use
 21 the DBA's to mean 20/20/20, BurnRescue
 22 or FirstStep.

23 Okay?

24 A I write most, if not all of
 25 it for WonderWork.

1 BRIAN MULLANEY - VOLUME I
 2 So that's my strategy when I write a
 3 letter.

4 Q Okay.
 5 Is there a formula for the
 6 information that gets included in the
 7 solicitations?

8 A Not really. Sometimes you
 9 write a long letter, and it works.
 10 Sometimes you write a short letter and
 11 it works.

12 There is no formula -- it's
 13 more of an art than a science. So I
 14 would say no. Also we are always
 15 trying to do better. We are all
 16 driven by results, response rate, plus
 17 gift size, put together gives you your
 18 cost to raise a dollar.

19 So we know what is good and
 20 what is bad and you're always trying
 21 to do a successful direct mail piece
 22 that beats your average and that
 23 raises a lot of money.

24 Q And now let's turn to the
 25 DBAs.

1 BRIAN MULLANEY - VOLUME I
 2 A Right.
 3 Q I will ask the same
 4 questions.
 5 Who generally prepares the
 6 materials?
 7 A Usually our direct mail
 8 vendor has been doing it. I have been
 9 really unhappy with their writing
 10 because it's usually some 22-year-old
 11 who has never been in a burn ward in
 12 Delhi, and it sounds like it.
 13 So I have been writing --
 14 over the last year, I have been
 15 writing much more even though it's
 16 more work.
 17 MR. LILIEN: Which vendor
 18 are you referring to?
 19 THE WITNESS: DMP --
 20 not DMP. They are our Cajun
 21 people.
 22 I am blanking on the name.
 23 Angela Scrubling (ph) is the
 24 president. Our current direct
 25 mail --

1 BRIAN MULLANEY - VOLUME I
 2 Northeast or something. Four NorE
 3 [sic] or something like that.
 4 They were horrible. We
 5 fired them and came back and then TMT
 6 came back to us and then TMT quit
 7 again and we had to do another search
 8 and ended up with CDR.
 9 MR. LILIEN: When TMT quit
 10 the second time, did they give you
 11 a reason?
 12 THE WITNESS: Yes.
 13 MR. LILIEN: What was the
 14 reason?
 15 THE WITNESS: They were
 16 threatened by Wang.
 17 MR. LILIEN: Any more
 18 detail?
 19 THE WITNESS: Susie
 20 Schaefer, the CEO, she is Wang's
 21 personal secretary. She is also
 22 vice chairman of the board, his
 23 secretary. She is at Smile Train.
 24 She goes back and reports to him
 25 and does whatever he says.

1 BRIAN MULLANEY - VOLUME I
 2 BY MR. CURCHACK:
 3 Q CDR?
 4 A Yes.
 5 Q Okay.
 6 Is that the only direct mail
 7 firm that you have worked with over
 8 the years?
 9 A No, I have worked with five
 10 or six.
 11 Q Who was the first one that
 12 you?
 13 A Russ Reid.
 14 Q At --
 15 A Sorry. You said over the
 16 years.
 17 Q I did. I did.
 18 A Yeah, WonderWork we started
 19 and a key part of our business plan
 20 was getting TMT. We raised
 21 \$700 million with them in Smile Train.
 22 We were a good team.
 23 So they signed up with us
 24 and then Wang made them quit. Then we
 25 went to Boston and hired a firm called

1 BRIAN MULLANEY - VOLUME I
 2 She was on the board for
 3 10 years when I was there. She
 4 didn't say one word at the meeting
 5 on the board in 10 years.
 6 BY MR. CURCHACK:
 7 Q Do you recall when you
 8 started working with CDR?
 9 A Not exactly, no.
 10 Q Who is American List
 11 Counsel?
 12 A I don't know.
 13 Q Does WonderWork use any list
 14 brokers?
 15 A Yes.
 16 Q How did they find them?
 17 A There are a million of them,
 18 because there are tens of thousands of
 19 lists. We use CDR's list broker for
 20 our first six, nine months with them.
 21 The guy was horrible.
 22 So we -- this broker is
 23 horrible. He's on the phone. Sounds
 24 really bad. I went to the website
 25 with the list broker, and he was the

1 BRIAN MULLANEY - VOLUME I
 2 receptionist.
 3 MR. LILIEN: Brian, before
 4 you get into that, what is a list
 5 broker?
 6 THE WITNESS: A list broker
 7 goes out and gets your list. What
 8 do you want to reach? I am
 9 raising money for veterans. There
 10 are millions of lists you can
 11 rent. Nobody sells names. You
 12 rent names. They cost seven cents
 13 a name, ten cents a name.
 14 MR. LILIEN: What is a good
 15 list broker?
 16 THE WITNESS: A good list
 17 broker can help you find the right
 18 list and then negotiate great
 19 deals with you on the list.
 20 And it's getting more
 21 complicated because it used to be
 22 you just go by Habitat For
 23 Humanity's list or UNICEF's list
 24 or Frontgate catalog,
 25 Architectural Digest.

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BRIAN MULLANEY - VOLUME I
 know -- I told him my biggest
 problem, I was drowning in data.
 You mail all this stuff and it
 comes in. You are doing testing
 and stuff. And the vendors lie to
 you because they just want more
 tonnage, so the answer to every
 question is you got to mail more.
 He said it's a horrible
 thing. I am going to send you my
 smartest PhD for a year for free
 to work out of your office. Buy
 her a \$10,000 computer.
 The first thing she does --
 she comes in and we tell her what
 we do. You goes you people are
 idiots because you keep renting
 Walter's name and you mail him 40
 times and you are paying for him
 and he's not giving you any money.
 You got to stop mailing to Walter.
 So we said what should we
 do? She said stop buying this
 list. Let's get every name in

1 BRIAN MULLANEY - VOLUME I
 2 We used to have all these
 3 lists, but now they are putting
 4 them all together in databases
 5 like Experian. You can buy a
 6 slice of that repository with
 7 different things, you know.
 8 BY MR. CURCHACK:
 9 Q Do you buy that from the
 10 repository, or does the list broker do
 11 that for you?
 12 A No. We buy it the
 13 repository with a list broker. It's
 14 like a real estate broker.
 15 MR. LILIEN: They get a cut?
 16 THE WITNESS: Yeah, they get
 17 a cut. They have great expertise.
 18 They can help you if they are
 19 good. But since you asked about
 20 this question, Steve Levitt, who
 21 is a brilliant guy -- he's on the
 22 board. He's the smartest guy I
 23 ever met.
 24 He was helping us at
 25 Smile Train and he says, you

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BRIAN MULLANEY - VOLUME I
 America. We will make our own
 list. She was a genius. And she
 did that. She took our average
 list cost from eight cents down to
 two cents.
 MR. LILIEN: What was she
 focused on?
 THE WITNESS: You can say do
 they have college education? Do
 they have a pool? Do they have a
 dog? Is their name Jack? Jack
 donates more than the name Ted.
 You do all these filters. You can
 generate a list.
 Have they given in the last
 12 months? What was the gift?
 It's predictive modeling. And
 Steve Levitt was involved too. We
 said, Steve, we are going to send
 30 million people this mailer for
 acquisition and he would take the
 30 million and he would take out
 eight, and say mail these 22
 million; eight are not going to

1 BRIAN MULLANEY - VOLUME I
 2 give you money.
 3 BY MR. CURCHACK:
 4 Q Where did the information to
 5 enable him to pull out that 8 million
 6 come from?
 7 A You can get all this
 8 information. You can find out what
 9 the credit card is, when was the last
 10 time they used it, when was the last
 11 time they bought a car, when was the
 12 last time they gave to a charity.
 13 There's all these things you
 14 can put on and above, but it's way
 15 above my pay grade. He did it. When
 16 he did that with that girl, we were at
 17 Smile Train and we were mailing 40
 18 million homes a year. There's only 90
 19 million homes in the US. We were
 20 mailing 40 million letters. Of the 90
 21 million homes, only 20 million are
 22 worth mailing.
 23 MR. LILIEN: Why is that?
 24 THE WITNESS: Because
 25 they -- they are just not

1 BRIAN MULLANEY - VOLUME I
 2 we hired her again at WonderWork in
 3 the beginning.
 4 Q So this list construction
 5 that you are talking about was at
 6 Smile Train?
 7 A Yes, yes.
 8 Q I misunderstood.
 9 A That was part of our
 10 business plan. Wow, if we can buy
 11 names for two cents instead of eight
 12 cents that gives us a huge advantage.
 13 Q Well, when you started
 14 WonderWork, did you go back to the
 15 beginning of buying lists?
 16 A Yes, renting lists. Yes.
 17 Q And now doing what you had
 18 done --
 19 A Right.
 20 Q Okay.
 21 A We did.
 22 Q And why did you come back to
 23 that basic?
 24 A We didn't have the money,
 25 and there were different causes. So

1 BRIAN MULLANEY - VOLUME I
 2 profitable. You know, you have to
 3 take all the ways and how much you
 4 have to mail. We were getting
 5 half a percent response rate, so
 6 mailing 200 letters to get one
 7 check.
 8 It's really data-driven.
 9 With their help, we went from 40
 10 million letters to a hundred
 11 million letters.
 12 BY MR. CURCHACK:
 13 Q Okay.
 14 A Sorry. That was a long
 15 answer.
 16 Q Okay.
 17 Is Amee Kamdar the person
 18 you're talking about?
 19 A Yes. Amee.
 20 Q And how long did she work at
 21 WonderWork?
 22 A Okay.
 23 Not Smile Train. She came
 24 to us at Smile Train, lived with us
 25 for a year, went to Chicago and then

1 BRIAN MULLANEY - VOLUME I
 2 at Smile Train, once you mail two or
 3 300 million letters, you have all that
 4 experience.
 5 So you put that in the
 6 computer and you can slice it and dice
 7 it and you can say, of these 200
 8 million letters we sent, what type of
 9 people do we want to find lists that
 10 have those people on it.
 11 MR. LILIEN: What kind of
 12 people are those?
 13 THE WITNESS: Well, it's
 14 actually all kinds. Like, you
 15 want old ladies to give you 35
 16 bucks and then they leave a
 17 million dollars in their will and
 18 you want 50-year-olds. You want
 19 80-year olds.
 20 It's kind of like Coca-Cola.
 21 It's a pyramid, you want everyone
 22 and then you want to do a
 23 marketing program that treats them
 24 all the right way.
 25 MR. LILIEN: When you wrote

1 BRIAN MULLANEY - VOLUME I
 2 acquiring lists for WonderWork --
 3 THE WITNESS: Renting lists.
 4 MR. LILIEN: -- renting
 5 lists, did you apply any of the
 6 similar principles you applied at
 7 Smile Train?
 8 THE WITNESS: Yes.
 9 MR. LILIEN: What were they?
 10 THE WITNESS: Well, for one
 11 we knew -- we knew what lists
 12 really worked for Smile Train.
 13 And it's a third-world surgery to
 14 help a kid, so there was an
 15 overlap. We predicted that any
 16 list Smile Train was using would
 17 work for us.
 18 MR. LILIEN: Work in what
 19 sense?
 20 THE WITNESS: Be effective.
 21 You are talking a donor.
 22 95 percent of the money raised in
 23 the US doesn't leave America.
 24 Very few Americans -- they want to
 25 help Boys' and Girls' Clubs. They

1 BRIAN MULLANEY - VOLUME I
 2 tell you the source of the list; it
 3 just gives you the names?
 4 A No, they tell us the source
 5 and they tell us here is what this
 6 list performs. This is the usual
 7 response. Here is the people that
 8 bought the list. The list comes with
 9 a whole pedigree of stuff that you
 10 look at.
 11 Q And did you rely on
 12 information that you learned while you
 13 were at Smile Train to be able to list
 14 brokers when you were at WonderWork?
 15 A Yes. I never dealt with the
 16 list brokers, though. I never met
 17 them. I would meet the direct mail
 18 vendor and it was -- they would go --
 19 you know, just to be clear.
 20 MR. LILIEN: Who would then
 21 work with your list brokers?
 22 THE WITNESS: Well, they
 23 would do a list plan. They show
 24 me the list plan. They would say
 25 here is the list we come up to,

1 BRIAN MULLANEY - VOLUME I
 2 want to help kids in Kentucky.
 3 We are going after a small
 4 group of people that care about a
 5 kid in India. It's very rare. So
 6 we mimic the whole Smile Train
 7 list and we knew a lot of them and
 8 hired the same list company that
 9 worked with Smile Train.
 10 MR. LILIEN: Your goal with
 11 renting the list is trying to find
 12 donors who are more likely to give
 13 to countries -- international
 14 countries?
 15 THE WITNESS: Yeah, it could
 16 be turned on because it's a
 17 children charity or a third-world
 18 charity and/or it's global health.
 19 But you never know, it could
 20 be the Republicans list or
 21 Democrats or, you know, Amnesty
 22 International.
 23 BY MR. CURCHACK:
 24 Q When you say you don't know,
 25 it's because the list broker doesn't

1 BRIAN MULLANEY - VOLUME I
 2 and I would look at it and say I
 3 like this. I don't like this, you
 4 know. And it was frustrating
 5 because at Smile Train, as your
 6 volume goes up, it's harder to
 7 find quality so it degrades.
 8 So if I just mailed a
 9 million people, I could get a
 10 hundred dollar gift. But to mail
 11 a hundred million people, you're
 12 down to a \$20 gift.
 13 So the secret is to go up in
 14 volume and keep the quality up,
 15 so...
 16 BY MR. CURCHACK:
 17 Q I noticed on some of the
 18 mailings that have check the box for
 19 how much your donation is going to be,
 20 50, 75, a hundred --
 21 A Yeah.
 22 Q -- or \$88.
 23 A Yeah.
 24 Q Why does it say \$88?
 25 A I don't know the answer to

1 BRIAN MULLANEY - VOLUME I
 2 that. That's called a gift array.

3 Q Yeah.

4 A We test it and we go a
 5 hundred, 50, 75. You go 75, up -- you
 6 go up and down. You test it for
 7 things. What helped us a lot is to do
 8 an amount for a whole surgery, the
 9 average donor gives you 50 bucks.

10 But you would say if you
 11 give us \$250, you would be paying for
 12 an entire surgery for a kid with
 13 clubfoot and you became a founding
 14 member. People like that. We would
 15 see a bump in those. That is the
 16 reasoning.

17 Q When that \$250 came in, was
 18 it treated any differently than the
 19 five other \$50 contributes?

20 A No. But the donor would be
 21 treated differently. We would say,
 22 wow, they are a major donor. They
 23 gave us five times as much. You would
 24 write to them and thank them for that.

25 Q But their \$250 didn't

1 BRIAN MULLANEY - VOLUME I
 2 because of all the turmoil, I've
 3 gotten much more involved. Usually we
 4 would only see that number at the end
 5 of the year in our 990 and our audited
 6 financials.

7 Q And what is your
 8 understanding of the basis on which
 9 that determination was made?

10 A Donor intent. If the donor
 11 intended it to go to a specific cause
 12 as it clearly is within our DBA then
 13 that qualifies as restricted.

14 If you can't tell the donor
 15 intent, you go to the appeal and say
 16 was the appeal written in a restricted
 17 way. If you send money, we are going
 18 to build a stadium at NYU. That's
 19 another way to do it.

20 And some people would just
 21 write notes, use this for burns, spend
 22 this in China, blah, blah, blah.
 23 Stuff like that.

24 So we keep track of all the
 25 notes during the year and at the end

1 BRIAN MULLANEY - VOLUME I
 2 actually go to pay for a surgery?

3 A It goes in a big pot. We
 4 can't track that. We can't say we are
 5 sending the money now. All the DBAs
 6 were 100 percent restricted. It was
 7 going to all surgeries.

8 Q Let's segue into the next
 9 section, which is restricted and
 10 unrestricted --

11 A Okay.

12 Q -- funds.

13 Who is responsible for
 14 classifying donations as restricted
 15 and unrestricted?

16 A I am responsible for
 17 everything, but the way it worked for
 18 six years at WonderWork and at
 19 Smile Train is Hana, who I raised 700
 20 million with, would sit down with KPMG
 21 at the end of the year and do our
 22 financials and say these are
 23 restricted, unrestricted and primarily
 24 that direction would come from KPMG.

25 This year has been different

1 BRIAN MULLANEY - VOLUME I
 2 of the year, Hana would add it up with
 3 the auditors and with JJ Coneys, who
 4 is our chair of the audit committee
 5 and former vice chairman at
 6 PriceWaterhouse.

7 I had tremendous confidence
 8 in these people and faith. I would
 9 accept whatever they showed me with
 10 rare instances.

11 Q What were the rare
 12 instances?

13 A One issue was HelpMeSee
 14 legal fees. So Wang found out about
 15 the arbitration and he went and met
 16 with Jim Ueltschi and at this point,
 17 they had no counterclaims against us
 18 at all, no complaints, zero.

19 Wang met with Ueltschi
 20 secretly and said you should fire your
 21 lawyers. My lawyers have been suing
 22 Brian for years, and I will help you.
 23 So Ueltschi did that. Wang's lawyers
 24 got involved and then they concocted
 25 all of the claims of the arbitration

1 BRIAN MULLANEY - VOLUME I
 2 and stuff.

3 And their motivation is to
 4 put us out of business and destroy us.
 5 Part of that is through legal fees,
 6 driving it through the roof. We
 7 offered to settle the arbitration for
 8 600 grand and instead they spent 6
 9 million.

10 And the thing -- I think I
 11 signed that we send in for the
 12 arbitration, we asked for two days of
 13 hearings and my lawyer told me it
 14 would take two months and cost 20 to
 15 30 grand and it took four years.

16 So those legal fees -- I'm
 17 sorry for giving you long answers. I
 18 wanted to give you context.

19 Those legal fees were from
 20 our partnership with a partner and
 21 that we have given hundreds of
 22 thousands of dollars of stuff, so KPMG
 23 agreed and those fees went into our
 24 program expenses.

25 Q So that I am clear, you're

1 BRIAN MULLANEY - VOLUME I
 2 legitimate program expense for that.
 3 Those allocations, Hana, again, does
 4 that at the end of the fiscal year
 5 with auditors by interviewing people,
 6 how much time are you working on this
 7 and that.

8 Q I am trying to understand
 9 why -- withdrawn.

10 Let me ask you a different
 11 specific question.

12 What do you consider a
 13 partner of WonderWork?

14 A A partner of ours is someone
 15 that we give money to provide
 16 surgeries --

17 Q Okay.

18 A -- and/or that we
 19 collaborate with for our mission in
 20 providing surgeries. So it could be
 21 like the [REDACTED]

22 [REDACTED], I consider a
 23 partner.

24 Q And how does --

25 A But 99 percent of them are

1 BRIAN MULLANEY - VOLUME I
 2 talking about the legal fees with
 3 HelpMeSee?

4 A Yeah.

5 Q The HelpMeSee arbitration --

6 A Yes.

7 Q -- being treated as --

8 A A program expense.

9 Q -- a program expense?

10 What does a program expense
 11 mean to you?

12 A A program expense is an
 13 expense related to our program. It
 14 can be a wide variety of things.

15 Q I think you said earlier
 16 your programs are providing surgeries
 17 for blindness, clubfeet?

18 A Right. That is the end
 19 product but we have people on staff
 20 that go out and find these hospitals
 21 and monitor them, so we have salaries
 22 for that. We have overhead that we
 23 allocate towards that.

24 I go on trips. I was just
 25 in Bangladesh for that. That is a

1 BRIAN MULLANEY - VOLUME I
 2 hospitals or NGOs.

3 Q Okay.

4 I can -- hospitals, I
 5 understand.

6 A Yep.

7 Q NGOs would be how -- how
 8 would they fit into the model?

9 A Because they provide
 10 surgeries, so we work through them.
 11 So the best clubfoot group in the
 12 world is [REDACTED].

13 We know them because we
 14 worked with them for decade at
 15 Smile Train. We give them our money
 16 for clubfoot, as well as a couple
 17 other places but primarily them and
 18 they have 20 orthopedic hospitals in
 19 the world for which they provide.
 20 They are kind of like a wholesaler.

21 Q Okay.

22 And how would the [REDACTED]
 23 [REDACTED] fit into that?

24 A Well, part of our mission is
 25 safety and quality. So they help

1 BRIAN MULLANEY - VOLUME I
 2 provide quality assurance with our
 3 partners. One of their members is on
 4 our medical advisory board and stuff
 5 like that.

6 Anesthesia is super
 7 important with surgery. That's where
 8 all the trouble is and stuff. But
 9 that's kind of a rare exception. We
 10 don't have a lot of those, but that's
 11 all I can think of.

12 Q That's fine.

13 A And how is HelpMeSee a
 14 partner?

15 A HelpMeSee is a partner
 16 because we signed a contract with them
 17 that we would give them millions of
 18 dollars in grants and we started
 19 writing them grants right away.

20 They said they have no money
 21 for cataract surgeries four months
 22 after they hired us and we gave them
 23 235,000. Then we gave them another
 24 150,000. Then we gave a \$400,000
 25 grant. I gave them personally \$25,000

1 BRIAN MULLANEY - VOLUME I
 2 creative and the writing and the
 3 pictures and stuff like that.

4 Q And they would hire --

5 A TMT.

6 Q -- TMT or somebody like
 7 that?

8 A Yeah.

9 MR. LILIEN: Would you
 10 create their copy -- the content?

11 THE WITNESS: Their
 12 intellectual content, yes.

13 BY MR. CURCHACK:

14 Q Okay.

15 And who would the money come
 16 into?

17 A To them. We never touched
 18 the money.

19 MR. LILIEN: These were
 20 solicitations made under
 21 HelpMeSee --

22 THE WITNESS: Yes.

23 MR. LILIEN: -- paper,
 24 literature?

25 THE WITNESS: Yes.

1 BRIAN MULLANEY - VOLUME I
 2 to help them with their mission of
 3 providing cataract surgeries.

4 So the whole dispute arose
 5 between us and them. The service
 6 agreement, it was two like-minded
 7 charities who were out to solve
 8 cataract blindness. That was the
 9 initial attraction before the
 10 relationship deteriorated.

11 Q What did they hire you to do
 12 for them?

13 You described it as a
 14 services agreement, so --

15 A They hired us to help them
 16 raise money. They didn't have any
 17 expertise in it. They had a
 18 two-person office. They hired us.
 19 Hana set up their books. They didn't
 20 have a G-out.

21 Q Did you send out mailings on
 22 their behalf?

23 A Yes. We didn't send them,
 24 because we are not registered to send
 25 them. But we helped them develop the

1 BRIAN MULLANEY - VOLUME I
 2 BY MR. CURCHACK:

3 Q Money would go to them?

4 A Yeah.

5 Q So where the grants come
 6 into this?

7 A Well, as part of our
 8 contract, we had to pay them -- I
 9 forget -- I forget how much. But a
 10 percentage of our fees from them, we
 11 had to give them back in terms of
 12 grants.

13 MR. LILIEN: I'm sorry, I am
 14 not following that.

15 THE WITNESS: As part of our
 16 contract, we had to give them back
 17 a percentage of our fees from them
 18 in grants.

19 BY MR. CURCHACK:

20 Q So they paid you -- I am
 21 making up the numbers -- \$200,000 a
 22 month.

23 You had to give them -- I am
 24 making up the numbers -- you had to
 25 give them a \$50,000 grant that month?

1 BRIAN MULLANEY - VOLUME I

2 A It was at the end of the
 3 contract or prorated, if the contract
 4 was terminated. In addition to that,
 5 we gave them grants of our own
 6 discretion, trying to be good guys.
 7 We are like why aren't you doing
 8 cataract surgeries.

9 And the conflict they had is
 10 Ueltschi. They come from flight
 11 simulator world.

12 You know this, right.

13 Do you know this.

14 MR. LILIEN: We are aware.

15 THE WITNESS: Ueltschi's
 16 father invented the flight
 17 simulator. So they see everything
 18 through that. They wanted to
 19 develop an operating simulator,
 20 and they want to sell it
 21 commercially. They came to us and
 22 said we want you to raise money.
 23 We said nobody is going to give
 24 money for a simulator, but all
 25 these people need cataract

1 BRIAN MULLANEY - VOLUME I

2 Q So -- so they could then in
 3 their mailings say we have done
 4 surgeries?

5 A Yeah. They weren't telling
 6 the truth. Yeah. And I met with
 7 their auditor and told them.

8 I said it's not fair to talk
 9 about showing pictures of kids or
 10 adults. Their direct mail is
 11 identical to ours and most -- very
 12 little of the money is going to
 13 surgeries.

14 They spend more money on
 15 legal fees than they spend on
 16 surgeries.

17 Q Let's go back to WonderWork
 18 as opposed to DBAs.

19 A Sure.

20 Q How does WonderWork account
 21 for funds raised under the WonderWork
 22 name as between restricted and
 23 unrestricted?

24 MR. TRIVIGNO: Could we do
 25 timing, because there was a

1 BRIAN MULLANEY - VOLUME I
 2 surgeries. You can do that.

3 So if you look at their
 4 books or if you look at their 990,
 5 they are spending nothing on
 6 cataract surgeries. They are
 7 spending all their money on the
 8 simulator which they want to
 9 commercialize.

10 So we -- we are doing all
 11 this direct mail for you, and we
 12 built their website and it says we
 13 will do one hundred thousand
 14 surgeries this year and they
 15 called up and said make it 70,000,
 16 make it 40,000, make it 30.

17 They brought it down to
 18 nothing. We said why aren't you
 19 doing surgeries. We said we don't
 20 have money to do it. We said here
 21 is a grant from our own donors
 22 that we don't have to give you.
 23 It's not on the contract. Here is
 24 \$235,000.

25 BY MR. CURCHACK:

1 BRIAN MULLANEY - VOLUME I
 2 change?

3 BY MR. CURCHACK:

4 Q Okay.

5 Sure. Initially.

6 A Initially, it was all coming
 7 in unrestricted.

8 Q Okay.

9 A Because we needed the money
 10 for -- we were glad it was
 11 unrestricted, and so the appeals were
 12 unrestricted in general helping us,
 13 startup money.

14 If you start at the
 15 beginning, help us get this new
 16 charity on track. We need your money.

17 When the big direct mail
 18 wasn't working and we stopped
 19 acquisition, it cut our spending
 20 tremendously.

21 Q When was that?

22 A That was like two years ago,
 23 roughly. In the board reports, you
 24 will see I talked to the board. It's
 25 not working as well as we hoped. It's

1 BRIAN MULLANEY - VOLUME I
 2 not working like Smile Train. We have
 3 to pivot. So we focused our efforts
 4 to do direct mail but make it more
 5 high-end.
 6 We stopped spending seven,
 7 eight million a year with these mass
 8 mailing, which worked well but not
 9 very good. The margin wasn't good.
 10 Q Did you do mass mailings at
 11 WonderWork, or did you do mass
 12 mailings --
 13 A Never at WonderWork.
 14 Q Okay.
 15 So just dealing with
 16 WonderWork for the moment.
 17 A Okay.
 18 When that happened over
 19 here --
 20 Q "Over here" meaning --
 21 A DBAs.
 22 Q Okay.
 23 A The nature of our appeals
 24 changed and then became more explicit
 25 at -- for WonderWork. So if you read

1 BRIAN MULLANEY - VOLUME I
 2 I think you were talking in the
 3 context of restricted,
 4 unrestricted and having specific
 5 language in your mailings.
 6 That was the conversation.
 7 You then referred to having some
 8 of your materials referred to
 9 helping Wonder -- there are lines
 10 of people waiting for surgeries.
 11 THE WITNESS: Yeah.
 12 MR. LILIEN: How does that
 13 relate to the restricted,
 14 unrestricted?
 15 THE WITNESS: It relates
 16 because it says specifically your
 17 money is going to go towards
 18 surgeries.
 19 MR. LILIEN: In your mind,
 20 what does that mean?
 21 THE WITNESS: It should be
 22 restricted.
 23 MR. LILIEN: For that
 24 purpose?
 25 THE WITNESS: Yes, if it's

1 BRIAN MULLANEY - VOLUME I
 2 the letter, some of them say help us.
 3 You know, we got a waiting list at
 4 this partner. They need surgeries.
 5 We need your help. Your money will go
 6 to help pay for these surgeries, stuff
 7 like that, or sometimes the appeal is
 8 not, and it's general.
 9 Q Do you recall when that
 10 shift happened at the WonderWork
 11 level?
 12 A There was no specific. It
 13 was like an evolution.
 14 MR. LILIEN: Could you go
 15 back to what you said a moment
 16 ago, they help us; there are
 17 waiting lists for surgeries?
 18 THE WITNESS: Yeah.
 19 MR. LILIEN: What point are
 20 you making with that?
 21 THE WITNESS: The urgency of
 22 the problem. One-third of all the
 23 blind are in India.
 24 MR. LILIEN: Let me ask -- I
 25 was asking a different question.

1 BRIAN MULLANEY - VOLUME I
 2 that mailer. But I write all the
 3 mailers, but I write different
 4 kinds.
 5 Sometimes it's Christmas,
 6 and you say it's been a great
 7 year. You helped us do this, this
 8 and this. We want to thank you.
 9 If you can help us again. You
 10 know, stuff like that.
 11 BY MR. CURCHACK:
 12 Q When you prepare the
 13 mailings, do you consider whether the
 14 funds are going to come in restricted,
 15 unrestricted?
 16 A Not really.
 17 Can I say that with an
 18 exception like [REDACTED] said do a
 19 matched program thing, so that mailing
 20 was written for her, but that's an
 21 exception.
 22 Usually it's me trying to
 23 write the most emotional thing I can.
 24 Q So now, just dealing with
 25 the period before the bankruptcy

1 BRIAN MULLANEY - VOLUME I
 2 filing.
 3 Did the way that WonderWork
 4 classified its donations as
 5 restricted, unrestricted, did that
 6 change at any point?
 7 A Yes.
 8 Q Tell us about that.
 9 A Well, we realized somewhere
 10 around our June board meeting that --
 11 Q June of what year, please?
 12 A 2016.
 13 Q Okay.
 14 A We realized, wow, we are not
 15 doing these huge mailings anymore,
 16 which was kind of a relief to me
 17 because it's a lot of money.
 18 It was a lot of waste. The
 19 net was very small, you know. So we
 20 stopped doing that. We are not doing
 21 any acquisition. We are limited with
 22 blindness acquisition. So we said,
 23 wow, our expenses have come down. We
 24 don't have this huge direct mail bill.
 25 We can probably live on our

1 BRIAN MULLANEY - VOLUME I
 2 programs, people, overhead, rent, all
 3 the allocations.
 4 Q Tell us what you view those
 5 allocations as being.
 6 A Well, we have two program
 7 people that spend almost all their
 8 time on programs, don't do anything
 9 else. We have two fundraising people,
 10 Janet and Vera. They do nothing with
 11 programs.

12 I am kind of a split. Hana
 13 is split. At the end of the year,
 14 Hana goes around with KPMG and decides
 15 what the allocation is and how much do
 16 I allocate for Brian's salary, rent,
 17 overhead, all that stuff.

18 Q Hana decides how much to
 19 allocate?

20 A The auditors really do, but
 21 she enables it to happen.

22 Q Do you know how much of your
 23 salary is allocated one way or the
 24 other?

25 A I don't know offhand, but I

1 BRIAN MULLANEY - VOLUME I
 2 unrestricted money.
 3 And we could tell donors a
 4 hundred percent is going to surgeries
 5 and stuff. So we have seven
 6 employees, and our overhead is very
 7 low and our rent is very low.
 8 So in September, we
 9 discussed that and then we said, Hana,
 10 look at the numbers. Do you think we
 11 can live on money coming in, primarily
 12 [REDACTED] money and tell other
 13 WonderWork donors their money will be
 14 unrestricted also?
 15 And we came to the
 16 conclusion that we could, and in
 17 September we put it on our websites
 18 and our stationery in September of
 19 last year.
 20 Q And that is the line that
 21 says 100 percent of your donation will
 22 go towards our surgeries?
 23 A Not surgeries, surgery
 24 programs, because like I said, it pays
 25 for all the stuff that goes with

1 BRIAN MULLANEY - VOLUME I
 2 see it at the end of the year. I
 3 think it is usually half and half. I
 4 don't know.

5 Q Did you ever question how it
 6 was allocated?

7 A I don't remember.

8 MR. LILIEN: Do you see a
 9 distinction between program and
 10 restriction -- or restricted --
 11 let me rephrase it a little
 12 different.

13 It sounds as though -- I
 14 don't want to put words in your
 15 mouth, but it sounds like you are
 16 using those program allocations --
 17 cost allocations to program as
 18 being the same criteria you use in
 19 determining when a gift is
 20 restricted.

21 Is that right?

22 THE WITNESS: No.

23 MR. LILIEN: Tell me --

24 THE WITNESS: I don't quite
 25 understand what you are saying.

BRIAN MULLANEY - VOLUME I

1 MR. LILIEN: Let me ask you
2 a question.

3 Well, let me ask you a
4 question. When in your mind does
5 the gift became restricted?

6 THE WITNESS: All of our
7 DBAs are restricted to WonderWork.
8 The gift is restricted if the
9 donor let's us know what their
10 intent is or expectation.

11 So if the donor is giving us
12 400 grand, and the first 50 grand
13 they say I want all my money going
14 to surgeries, we treat it because
15 we know them and that's their
16 expectation.

17 If you don't have any idea
18 from the donor intent, you look at
19 the appeal.

20 MR. LILIEN: Okay.

21 THE WITNESS: You see if the
22 appeal is specific or general. If
23 it's general, your gift will help
24 in the general ongoing expenses.

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BRIAN MULLANEY - VOLUME I

Our staff is still tiny. Our
overhead is low, but we appreciate
your support.

MR. LILIEN: What about a
specific appeal?

THE WITNESS: A specific
appeal would be I just got back
from Bangladesh. I met with three
partners they have waiting lists.
They have people that they are
turning away. We need help for
more surgeries. We are trying to
reach a goal of 92,000 this year.
Will you help us reach that goal?

MR. LILIEN: And if
something is restricted according
to that appeal --

THE WITNESS: Yeah.

MR. LILIEN: -- what does
the scope of that restriction
mean? What do you think you could
use that money for?

THE WITNESS: That would
have to be used, in my opinion,

BRIAN MULLANEY - VOLUME I

That's a general gift.

If it's a specific appeal --
I just got back from Bangladesh,
and they need a new microscope,
stuff like that. That would be
restricted --

MR. LILIEN: Can you --

THE WITNESS: -- in my
belief.

MR. LILIEN: -- go a little
further and give an example what a
general --

THE WITNESS: What an
general appeal would be?

MR. LILIEN: Yes.

THE WITNESS: Oh, that would
be an appeal that's talking about
all the great things we are doing.
Thank you, Jason, for helping us
start this charity. We are in 43
countries now. Our surgery is
going strong. We are doing burns,
clubfoot. We have a viral video
that 16 million people just saw.

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BRIAN MULLANEY - VOLUME I
for surgeries, surgery programs.

MR. LILIEN: What would be
included again --

THE WITNESS: For that,
blindness.

MR. LILIEN: Let me ask you,
what do you believe would be
included in the surgery program?

THE WITNESS: All the stuff
the auditors say is program, so
it's salaries, overhead,
in-country costs, program costs.

MR. LILIEN: And if your
mailings had language on them that
a donor has paid for all
overhead --

THE WITNESS: Right.

MR. LILIEN: -- and
administrative expenses --

THE WITNESS: Right.

MR. LILIEN: -- would you
still think it's appropriate to
use the restricted gift to pay for
overhead?

BRIAN MULLANEY - VOLUME I

THE WITNESS: It's a good question. I don't know. So you are saying I write a general appeal, but it says all your money is going to surgeries?

To me the donor read what you are doing with their money, and they responded to it.

So, yes, I would say that's restricted.

MR. LILIEN: For surgeries?

THE WITNESS: Yeah. That's even more explicit than my example. You should know, too, we only put that on stationery in September and then we went bankrupt two months later.

We did have that appeal -- we did use that for five, six years at Smile Train, you should know too, and it was effective, but we got too big.

BY MR. CURCHACK:

Q Let me ask you another

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BRIAN MULLANEY - VOLUME I

A That's okay.

Q Sometimes it says 100 percent of your donation will go towards surgeries. Sometimes it says 100 percent will go towards our surgery programs.

A Right.

Q Do you recall that that distinction exists?

A Yes.

Q And in your mind, what is the distinction?

A Well, one is more accurate. I think the intent is the same, but it's more accurate language, programs. We got more buttoned up and said we should always use those words.

Q So if money came in under a surgery-only appeal --

A Yeah.

Q -- you would have treated it as if it was for surgery programs?

A Yes.

Q Am I saying that correctly?

BRIAN MULLANEY - VOLUME I
question.

MR. LILIEN: Brian, I just want to make sure I understand.

If that same mailing said we will use your money for surgeries or our surgery programs --

THE WITNESS: Yeah.

MR. LILIEN: -- let me know if there's a difference between the two -- but didn't have the 100 percent language on them --

THE WITNESS: Yeah.

MR. LILIEN: -- how would you view that --

THE WITNESS: I would view it as restricted with a specific appeal.

MR. LILIEN: Okay.

I'm sorry.

BY MR. CURCHACK:

Q Some of the -- I don't want to take the time to pick out examples. We could, if it would help you. I am happy to.

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BRIAN MULLANEY - VOLUME I

A Yes, you should always say programs, and we didn't. We amiss in doing that. There's no way to say -- where does it end? You pay for the anesthesia. You pay for the surgeon. It's impossible to separate it.

MR. LILIEN: Is there any -- sounds like what you are saying is that -- and correct me if I am wrong -- when it refers to surgeries or surgery programs, you would use or could use restricted money to pay not just for the surgeries but for the overhead or administrative expense allocated with a portion of the staff's time --

THE WITNESS: I think so.

MR. LILIEN: -- in arranging for or providing -- arranging for the surgeries and providing grants for the partners.

Is there anything beyond the staff time -- I know you mentioned

1 BRIAN MULLANEY - VOLUME I
 2 travel before. You visit some of
 3 the facilities.
 4 Beyond the staff time and
 5 beyond the travel expenditure, is
 6 there anything else that would be
 7 part of the surgery programs?
 8 THE WITNESS: Well, you're
 9 talking surgery programs.
 10 Are you talking program
 11 money.
 12 MR. LILIEN: Let's start
 13 with surgery program -- surgery to
 14 surgery programs.
 15 THE WITNESS: Nothing with
 16 surgery programs. We have
 17 awareness programs. It's part of
 18 our mission to raise awareness.
 19 We did a video that's 16
 20 million people have seen. It was
 21 the most favored video on the
 22 National Geographic website for a
 23 year.
 24 MR. LILIEN: What video?
 25 THE WITNESS: It's called

1 BRIAN MULLANEY - VOLUME I
 2 in response to a mailing that said
 3 surgery programs as opposed to
 4 programs, then is there a distinction
 5 there?
 6 A That is a good question. So
 7 you are saying could that money be
 8 used to send out information? I don't
 9 know. I don't know.
 10 I have the auditor that
 11 tells us that.
 12 (Whereupon a Discussion is
 13 Held Off the Record.)
 14 (Exhibit 5 is Marked.)
 15 THE REPORTER: 5.
 16 (Whereupon a Discussion is
 17 Held Off the Record.)
 18 BY MR. CURCHACK:
 19 Q Mr. Mullaney, I asked the
 20 reporter to mark Exhibit 5, an e-mail
 21 thread. The identification number
 22 0020577. That's from -- the first
 23 e-mail is from you to Hana dated
 24 December 7, 2016.
 25 Do you recall this e-mail?

1 BRIAN MULLANEY - VOLUME I
 2 First Sight. It's about two
 3 Indian girls -- sisters born
 4 blind, we gave them their eyesight
 5 back.
 6 It got us donations from 92
 7 countries, including Kazakhstan
 8 where Borat is from. So we do
 9 that.
 10 We also have public
 11 information stuff that -- that is
 12 in the direct mail that is in all
 13 our acquisition -- we are not
 14 doing acquisition, so it's not
 15 relevant.
 16 That counts as program
 17 spending but not surgery programs.
 18 BY MR. CURCHACK:
 19 Q So the informational
 20 component is program but not surgery
 21 program; is that correct?
 22 A Well, the way he's asking
 23 with the money, yeah, it's a program
 24 expense.
 25 Q But if the donation came in

1 BRIAN MULLANEY - VOLUME I
 2 A Not really, but I believe it
 3 is what it is.
 4 Q Okay.
 5 I would like you to look at
 6 the e-mail down at the bottom, which
 7 is from Hana to you. I would like to
 8 ask you some specific things to the
 9 best of your recollection.
 10 The first line says, "Of the
 11 total WonderWork donations we have
 12 already restricted [REDACTED],
 13 [REDACTED]"
 14 Do you know what that is
 15 referring to?
 16 A (Reviewing.)
 17 I think it is referring to a
 18 pledge from [REDACTED] that he later
 19 rescinded and a \$400,000 grant from
 20 [REDACTED] for an IT program.
 21 Q For an --
 22 A IT program.
 23 Q So that was restricted to
 24 that particular program?
 25 A Yes.

1 BRIAN MULLANEY - VOLUME I
 2 Q That was, I believe, the
 3 database that was being prepared?
 4 A Yes, exactly.
 5 Q Okay.
 6 Next it says, "We can
 7 reclassify \$255,000 and change from WW
 8 to blindness restriction based on
 9 grant proposals."
 10 What does that mean to you?
 11 A (Reviewing.)
 12 I really don't understand it
 13 because if it -- I don't understand
 14 it. If it came in through our
 15 20/20 blindness website, it's going
 16 towards blindness.
 17 If it came into the
 18 WonderWork website, maybe that's
 19 something that mentioned blindness or
 20 a reference to the video. I don't
 21 know.
 22 Q If a -- if a WonderWork
 23 mailing?
 24 A Yeah.
 25 Q -- said we will take your

1 BRIAN MULLANEY - VOLUME I
 2 every DBA is restricted, and we
 3 operated on that for six years, so
 4 I don't know.
 5 BY MR. CURCHACK:
 6 Q The last line on the bottom
 7 of this page says, "If we restrict
 8 [REDACTED] funds, maybe send a letter?
 9 We have 1,925,179 remaining."
 10 Do you know what that means?
 11 A Well, he did not restrict
 12 his money. It's been unrestricted, so
 13 I am surprised he's asking that, but
 14 no.
 15 I think that's what she is
 16 saying. Did he send me a letter?
 17 Sometimes he sends me e-mails, and she
 18 doesn't get it. No, he did not
 19 restrict it.
 20 Q Do you know what the 1
 21 million 925 remaining is referring to?
 22 A (Reviewing.)
 23 Well, on the next page he
 24 has that remaining amount, which is
 25 the wrong amount because [REDACTED]

1 BRIAN MULLANEY - VOLUME I
 2 money and use it for our blindness
 3 program, do you think that's what that
 4 might mean?
 5 A No, I think that the
 6 donor -- it's a weird number -- may
 7 have given it -- it's a web donation,
 8 so it came in -- it could have been
 9 donations that came in through the
 10 WonderWork website that are intended
 11 for blindness.
 12 We got a lot of donations in
 13 the website from that video that 16
 14 million people saw, so it could
 15 probably be that.
 16 MR. LILIEN: Do you know
 17 whether the website indicated that
 18 money raised would go towards
 19 blindness?
 20 THE WITNESS: You mean
 21 100 percent?
 22 MR. LILIEN: Any language.
 23 THE WITNESS: I don't know.
 24 All I know from the very
 25 beginning, KPMG said by definition

1 BRIAN MULLANEY - VOLUME I
 2 money is not restricted. It's
 3 WonderWork money that she views as
 4 restricted.
 5 Q Oh, I see.
 6 That's -- that's not
 7 [REDACTED] 1 million 9 that he's
 8 referring to?
 9 A No, he gave us two million.
 10 Yeah.
 11 Q I see.
 12 A (Reviewing.)
 13 Q Okay.
 14 When it says, "WW letter
 15 sent to these 1.9 million remaining
 16 donors, asks them to fund surgeries in
 17 support of our mission," how would you
 18 interpret that?
 19 A As unrestricted. Support of
 20 our mission, I think is wording that
 21 means unrestricted.
 22 MR. LILIEN: So if it says
 23 to fund surgeries in support of
 24 our mission --
 25 THE WITNESS: Yeah, I view

1 BRIAN MULLANEY - VOLUME I
 2 it as ancillary to our general
 3 mission.
 4 MR. CURCHACK: I would like
 5 to mark as the next exhibit, which
 6 is Exhibit 6, an e-mail thread,
 7 three-pages long, production
 8 number 0020580, and the only
 9 e-mail I am going to ask you about
 10 is the first one on the first
 11 page, which is from you to
 12 Pamela Mann and Hana Fuchs.
 13 MR. TRIVIGNO: While he's
 14 reading, we have a continuing
 15 understanding about the
 16 reservation of rights, so going
 17 forward --
 18 MR. CURCHACK: Absolutely.
 19 (Exhibit 6 is Marked.)
 20 THE WITNESS: (Reviewing.)
 21 Okay.
 22 BY MR. CURCHACK:
 23 Q Do you remember writing this
 24 e-mail?
 25 A Yes.

1 BRIAN MULLANEY - VOLUME I
 2 with the legal definition of
 3 restricted, we said some of the
 4 WonderWork stuff should be restricted,
 5 especially after we put that on the
 6 stationery.


Q When you started to put the
hundred percent on --

A Yeah.

Q -- was the purpose to
encourage donations, or was the
purpose to create a restriction on the
funds?

A Oh, raise donations. I
never cared what was restricted or not
before this. To tell you the truth,
whatever the number was at the end of

1 BRIAN MULLANEY - VOLUME I
 2 Q Who is Kimberly?
 3 A She is our auditor at KPMG.
 4 Q Is she still your auditor?
 5 A No.
 6 Q But at the time of this
 7 letter, she was?
 8 A Yes. At least she was.
 9 Q Why did you tell her that
 10 you think you have been doing your
 11 restrictions wrong?
 12 A Well, because I was confused
 13 mand I was in a panic. We had just
 14 got this judgment and these are things
 15 that I saw at the end of the year and
 16 just signed and not really was
 17 involved with restricting,
 18 unrestricting, so I was trying to
 19 understand it.
 20 In the -- the custom was to
 21 restrict all the DBAs and the
 22 WonderWork stuff was unrestricted.
 23 After I looked into it and learned
 24 more about restricted in the last
 25 three months than I ever knew, and

1 BRIAN MULLANEY - VOLUME I
 2 the year, I didn't care. It was never
 3 an issue. It was to help us raise
 4 more money, get a better response.

MR. LILIEN: What was never
an issue?

THE WITNESS: Restricted,
unrestricted. We never ran out of
money. We never had a thing.

If you ask me what the split
was, I never really knew. Hana
did it with Kimberly and JJ and --
BY MR. CURCHACK:

Q Did WonderWork ever have an
outside auditor other than KPMG until
recently?

A I don't believe so.

Q Okay.
(Exhibit 7 is Marked.)

BY MR. CURCHACK:

Q I am going to ask the
reporter to mark as Exhibit 7, an
e-mail tread with the production
number 0020512, and I would like to
focus your attention initially to the

1 BRIAN MULLANEY - VOLUME I
 2 first e-mail, which is from you to
 3 Hana dated December 7th.
 4 A Hm-hm.
 5 Q Do you recall this e-mail?
 6 A Yes.
 7 Q The first line says, "This
 8 is from major donors and we need every
 9 penny, so please don't research just
 10 the large gifts."
 11 What is that referring to?
 12 A To make it correct so that
 13 we weren't blindly leaving them all
 14 unrestricted.
 15 Q In other words, to --
 16 A Correct the record.
 17 Q To --
 18 A Make it accurate.
 19 Q To reflect more funds as
 20 restricted rather than unrestricted?
 21 A (Reviewing.)
 22 Q When I say "reflect," I mean
 23 so -- why don't you explain what you
 24 mean.
 25 A I wanted it to be accurate.

1 BRIAN MULLANEY - VOLUME I
 2 the importance of a gift being
 3 restricted versus unrestricted?
 4 BY MR. CURCHACK:
 5 Q I am going to rephrase this
 6 question for him.
 7 Did anyone other than your
 8 lawyers ever discuss with you the
 9 importance or the reason why it
 10 mattered whether a gift was restricted
 11 or unrestricted?
 12 A I don't remember.

13 Q [REDACTED]
 14 [REDACTED]
 15 A [REDACTED]
 16 Q [REDACTED]
 17 A [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 BRIAN MULLANEY - VOLUME I
 2 We were in bankruptcy. I knew
 3 everyone was going to look at our
 4 stuff and it was embarrassing if we
 5 had been doing it wrong.
 6 And I never sat down with
 7 Kimberly and knew the definition of
 8 restricted. Once I understood what it
 9 was and that we can go back and look
 10 at the extra work, that's what I was
 11 asking her to do.
 12 Q Okay.
 13 A However it fell -- I mean,
 14 you heard her say about [REDACTED] I
 15 could have called him up. His was
 16 unrestricted. It always has been.
 17 We never took any steps to
 18 restrict something that shouldn't be
 19 restricted. I said simply go find
 20 stuff that we missed or that should be
 21 restricted and correct it.
 22 MR. LILIEN: During this
 23 period, did anyone ever advise you
 24 in connection with the bankruptcy,
 25 the impact of a restricted gift --

1 BRIAN MULLANEY - VOLUME I
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 Q [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

BRIAN MULLANEY - VOLUME I
[REDACTED]

A I don't think they did. I mean, I am smart enough to know. I know a lot of these donors, and I know why they give. I have known a lot of them for many, many years.

So I wanted to be -- honor intentions and stuff, so it meant a lot to me for that reason. I don't recall any lawyers telling me one way or the other that -- you know, about that.

Q Okay.

MR. LILIEN: I would like to follow up on that.

What do you believe the significance of a restricted -- of a gift being restricted is in the context of bankruptcy?

THE WITNESS: A restricted gift has to be spent on what the donor intended it to and can't be diverted to another use. I think that is the difference.

BRIAN MULLANEY - VOLUME I
we have no idea what his expectations were and we said, let's send out this letter and we spoke with our lawyers about it and said, sure, and it came back and I don't even know what the winner was or loser.

Q You said you think there were 17 of these that went out?

A I am pretty positive that it was 17 donors out of a hundred thousand donors.

Q And they were chosen by whom?

A I think we did a list of large donations and we said -- these are people we don't know. Let's give them a chance. You know, we are in the Appellate Court appealing our arbitration because it took away the rights of the donor.

You know, the arbitrator took money away from charity, gave to another without saying -- without talking to the donor. It was in that

BRIAN MULLANEY - VOLUME I

MR. CURCHACK: I would like to ask the reporter to mark a copy of a letter dated April 7, 2017, on WonderWork stationery, signed by Brian.

This particular letter is addressed to [REDACTED] [REDACTED], and it bears production number WON 07255, and I will represent this is one of the number of letters of very similar and we don't need to mark them all.

(Exhibit 8 is Marked.)

BY MR. CURCHACK:

Q Do you recall this?

A No, we sent out 17 of these, I think.

Q Who were they sent out to?

A They were sent to major donors that we discussed amongst ourselves, and said, like I just told you about [REDACTED], who we all know personally -- we said, [REDACTED],

BRIAN MULLANEY - VOLUME I
vein -- that spirit.

Q Who actually drafted this letter?

A I wrote it and then had it approved by our lawyers.

Q Did WonderWork ever ask a donor to clarify a donation prior to 2017?

A (Reviewing.)

I don't know. I would say probably, but I don't know.

Q Were there any other communications with any of these 17 donors other than the letter that was sent out?

A I don't know.

MR. TRIVIGNO: At the time.

BY MR. CURCHACK:

Q Yes, at the time at or about the time?

MR. TRIVIGNO: Same letter.

THE WITNESS: Oh, it is the same letter (Reviewing.)

I don't know.

1 BRIAN MULLANEY - VOLUME I
 2 BY MR. CURCHACK:
 3 Q Okay.
 4 MR. LILIEN: Was a version
 of this letter ever used or
 something similar to this letter
 ever used in any -- before
 8 April 7th --
 9 THE WITNESS: No, this is
 10 the only thing we did. This is
 11 the only time we thought it's
 12 important for us to know what
 13 these donors want, and they are
 14 our biggest donors.
 15 We didn't want to screw it
 16 up so.
 17 MR. CURCHACK: Let's take a
 18 quick break.
 19 (Whereupon a Recess
 20 Commenced at 4:57 and Testimony
 21 Recommenced at 5:19.)
 22 BY MR. CURCHACK:
 23 Q We may come back to some of
 24 this discussion tomorrow, but I will
 25 move on for now.

1 BRIAN MULLANEY - VOLUME I
 2 know what you call him, but he reviews
 3 all our appeals and he decides for her
 4 what is appropriate.
 5 Q Is that Ray Gelis?
 6 A I don't know his name.
 7 Q Do you know what the
 8 criteria that WonderWork uses -- what
 9 are the criteria that WonderWork uses
 10 to allocate the costs between
 11 fundraising and the program?
 12 A For joint allocation?
 13 Q Yes.
 14 A No, specifically no. I know
 15 the principles, but I don't know the
 16 specific --
 17 Q Okay.
 18 A I am not involved with that
 19 at all.
 20 MR. LILIEN: Before you do
 21 that, who is your auditor at
 22 Smile Train?
 23 THE WITNESS: I believe it
 24 was a firm called Titus. It was a
 25 minority-owned firm.

1 BRIAN MULLANEY - VOLUME I
 2 I want to ask you what you
 3 understand joint cost allocation to
 4 refer to.
 5 A It is the percentage of your
 6 direct mail efforts that pertain to
 7 public awareness and it's considered a
 8 program expense.
 9 It's a very wacky rule. If
 10 I was running the IRS, I would not be
 11 doing that but it is the rule and we
 12 came across it at Smile Train and our
 13 auditors recommend that we treat it
 14 that way, as most charities do, so we
 15 did.
 16 And I have always been
 17 conservative with it. If you look at
 18 Smile Train, I think they are claiming
 19 70, 80 percent. We put a lid on it of
 20 50 percent at Smile Train no matter
 21 what. I don't think it's a very smart
 22 thing but it is the rule and it is
 23 whatever auditors told us to do.
 24 KPMG told us to do it and
 25 Hana found a professional -- I don't

1 BRIAN MULLANEY - VOLUME I
 2 BY MR. CURCHACK:
 3 Q Do you recall whether KPMG
 4 and WonderWork had any disagreements
 5 over the allocation of costs?
 6 A I don't recall.
 7 Q Do you know --
 8 A I don't think we did.
 9 Q -- BDO and WonderWork were
 10 having any disagreements over the
 11 allocation of costs?
 12 A I actually think I got an
 13 e-mail 10 seconds ago saying
 14 everything that has worked out, but I
 15 don't know. I don't know.
 16 Q Who is WonderWork -- let me
 17 rephrase that.
 18 I want to show you --
 19 MR. LILIEN: Off the record.
 20 (Whereupon a Discussion is
 21 Held Off the Record.)
 22 MR. CURCHACK: We are going
 23 to mark as Exhibit 9 a package of
 24 three solicitations. One is from
 25 20/20/20. One is from BurnRescue

1 BRIAN MULLANEY - VOLUME I
 2 and FirstStep.
 3 (Exhibit 9 is Marked.)
 4 BY MR. CURCHACK:
 5 Q I would like to first ask
 6 you to look at the 20/20/20
 7 solicitation and tell us what you
 8 believe to be program-related content
 9 in this solicitation.
 10 A (Reviewing.)
 11 Well, I think there are
 12 different ways of doing it. Some
 13 people do it with a word count. I
 14 don't know because I haven't discussed
 15 this in years, but usually this is the
 16 public awareness type of information
 17 that counts.
 18 Q You're pointing to pages --
 19 A (Reviewing.)
 20 9025 and 9026.
 21 Q Okay.
 22 And let's look at the
 23 BurnRescue, if we could.
 24 Again, tell us what the
 25 pages are that you think --

1 BRIAN MULLANEY - VOLUME I
 2 six weeks.
 3 Q How is it done?
 4 A The kid comes in and you put
 5 a series of casts on just like braces
 6 on your feet.
 7 Q So there is no surgery
 8 involved in that?
 9 A There is surgery called a
 10 tenotomy at the end, but the feet are
 11 straight. They do a little -- it
 12 takes five minutes. It's a little
 13 release of some ligament.
 14 I am not a surgeon, but
 15 there is a surgical part of it called
 16 tenotomy. Then they sleep with a
 17 wire -- a steel rod that keeps their
 18 feet like this for a year or two and
 19 they are perfectly healed and it costs
 20 250 bucks.
 21 MR. LILIEN: Brian, turn to
 22 page 9073 for a minute.
 23 THE WITNESS: Sure.
 24 MR. LILIEN: This is where
 25 you identified the public

1 BRIAN MULLANEY - VOLUME I
 2 A (Reviewing.)
 3 Q -- are relevant here.
 4 MR. TRIVIGNO: By
 5 "relevant," you mean the program?
 6 MR. CURCHACK: Program.
 7 THE WITNESS: 9064, 9065.
 8 BY MR. CURCHACK:
 9 Q Okay.
 10 And FirstStep.
 11 A (Reviewing.)
 12 The 9073 and 9074.
 13 Q Looking at page 9073, do you
 14 see the reference to the Ponseti
 15 treatment?
 16 A Yes.
 17 Q What is that?
 18 A That is a miracle cure for
 19 clubfoot that was invented by this guy
 20 named Ponseti in Omaha or Wyoming,
 21 like somewhere out there, and it
 22 replaced these horrific
 23 Frankenstein-type surgeries that they
 24 used to do and it can straighten even
 25 the most twisted feet in as little as

1 BRIAN MULLANEY - VOLUME I
 2 education material about up-flip.
 3 THE WITNESS: Yeah.
 4 MR. LILIEN: What is the
 5 purpose of including this
 6 material?
 7 THE WITNESS: To inform
 8 people about clubfoot. And people
 9 get clubfoot in America. There's
 10 probably about 5,000. I am saying
 11 that because it is the same
 12 incidence of clefts, and that's
 13 how many clefts are born every
 14 year.
 15 Some people look at it and
 16 they read about it and it helps
 17 them and they come to our website
 18 or they learn more.
 19 The purpose is to raise
 20 awareness of the problem and
 21 inform them -- give them practical
 22 information that may help them.
 23 MR. LILIEN: Do you think
 24 people that have clubfoot are
 25 aware they have clubfoot?

1 BRIAN MULLANEY - VOLUME I
 2 THE WITNESS: Yes. Yes.
 3 MR. LILIEN: Again, what are
 4 you informing them about?
 5 THE WITNESS: They could be
 6 with an orthopedic surgeon that
 7 wants to operate on them and
 8 doesn't want to use the Ponseti
 9 method.
 10 MR. LILIEN: Do you have any
 11 data as to whether people who read
 12 this information ever use the
 13 information to help them get those
 14 surgeries --
 15 THE WITNESS: No.
 16 MR. LILIEN: -- those
 17 procedures?
 18 THE WITNESS: (Shaking
 19 head.)
 20 BY MR. CURCHACK:
 21 Q What mailings are these
 22 materials included in?
 23 A I believe only acquisition
 24 mailings.
 25 Q Again, what is an

1 BRIAN MULLANEY - VOLUME I
 2 in the mail, God knows what that is
 3 too, but yes.
 4 MR. LILIEN: Why do you
 5 target acquisition mailings? Why
 6 do you include these in
 7 acquisition mailings?
 8 THE WITNESS: Because it is
 9 the law that you can do it and you
 10 spend a ton of money in
 11 acquisition. So all the other
 12 charities we are competing with do
 13 the same thing.
 14 Like I said, I agree with
 15 you. If I ran the IRS, I would
 16 get rid of this law. But if you
 17 look at all the Red Cross and
 18 UNICEF, they do all this.
 19 Malaria -- like no one gets
 20 malaria in the United States. And
 21 they take advantage of it and our
 22 auditors told us we should do it.
 23 MR. LILIEN: Is it your
 24 understanding it's a law or
 25 accounting principle?

1 BRIAN MULLANEY - VOLUME I
 2 acquisition mailing?
 3 A That is a mailing to people
 4 who don't know you, non-donors,
 5 soliciting to acquire them as a donor
 6 and then once they are a donor, they
 7 get retention mailings.
 8 Q Do you ever send out a
 9 mailing to the same list twice?
 10 A Yes.
 11 Q Would you ever send an
 12 acquisition mailing to the same list
 13 twice?
 14 A Yes, of course.
 15 Q So that this material could
 16 conceivable go to somebody who has
 17 already received this material; is
 18 that correct?
 19 A Conceptually, yes. We had
 20 no idea. I was telling you it takes
 21 200 letters to get a donation back.
 22 So that is a half percent.
 23 So the people who read --
 24 who open the mail, God knows what that
 25 is. The people who read every piece

1 BRIAN MULLANEY - VOLUME I
 2 THE WITNESS: It's an
 3 accounting provision that if you
 4 include an information booklet,
 5 you are entitled to write off a
 6 certain amount of your direct
 7 mail.
 8 BY MR. CURCHACK:
 9 Q You are a charity, right?
 10 You are a 501(c)(3). You don't pay
 11 taxes.
 12 A Right.
 13 Q There's nothing to write
 14 off.
 15 What do you mean by "write
 16 off"?
 17 A You'd much rather have --
 18 there's a huge advantage because you
 19 have lower direct mail costs, and you
 20 have higher program costs.
 21 Q And how is that an
 22 advantage?
 23 A That is a huge advantage
 24 because donors look at you what are
 25 you spending on direct mail. What are

1 BRIAN MULLANEY - VOLUME I
 2 you spending on programs? They want
 3 programs to be high and they want
 4 direct mail there.

5 So that's why everyone does
 6 this. It is the law. They do it. I
 7 am with you. I didn't invent it. Our
 8 auditors recommend we use it. We
 9 could be the only ones -- surgical
 10 charity not doing it, but we are not.
 11 We took the advice.

12 MR. LILIEN: Who informed
 13 you it is the law?

14 THE WITNESS: I didn't
 15 mean -- we don't have to do it. I
 16 used the wrong word, it is the
 17 law. It's -- it's a practice.
 18 It's a practice that's very
 19 commonly used by charities, the
 20 biggest and the best in America
 21 and all our auditors have always
 22 said you should do this too and it
 23 will help you.

24 BY MR. CURCHACK:

25 Q Now -- and help you, again,

1 BRIAN MULLANEY - VOLUME I
 2 allocated joint costs to your
 3 knowledge?

4 A On acquisition, yeah. I
 5 believe we kept the same practice we
 6 had at Smile Train. Yes, I believe.

7 Q Did you allocate any joint
 8 costs on renewal mailings?

9 A I don't know. I don't think
 10 so because the expenditures is so much
 11 smaller. The savings would be not
 12 nearly as big, but I don't know. I
 13 don't think so.

14 I know at Smile Train we
 15 never did, but...

16 Q If WonderWork were to cease
 17 acquisition mailings --

18 A Yeah.

19 Q -- which sounds like was
 20 where you were headed --

21 A Yes.

22 Q -- then you would -- is it
 23 your understanding you would cease
 24 doing this kind of allocation?

25 A Yeah. It's one of the

1 BRIAN MULLANEY - VOLUME I
 2 in what respect?

3 A It helps you because it
 4 lowers the cost of your direct mail,
 5 and it increases your program costs.

6 Q So basically --

7 A Arbitrarily, I agree but
 8 that's what it does and that's why
 9 everyone does it.

10 MR. LILIEN: Let me ask you
 11 a question on this and tie it back
 12 to the restricted gifts for a
 13 moment.

14 Would your understanding be
 15 that money that came in for a
 16 restricted purpose could also be
 17 used to pay for mailings?

18 THE WITNESS: You asked me
 19 this before.

20 I don't know the answer to
 21 that, but it shouldn't be. But I
 22 don't know the answer to that.

23 MR. LILIEN: Okay.

24 BY MR. CURCHACK:

25 Q Has WonderWork always

1 BRIAN MULLANEY - VOLUME I
 2 reasons I was so relieved to pivot
 3 away from these big mailings. You
 4 know, we came and tried to be
 5 Smile Train again and we ramped up
 6 quickly with Amee Kamdar's help.

7 The results weren't good.
 8 It makes me sick to my stomach. I
 9 want to do surgeries. I don't want to
 10 do 3 million a year in public
 11 information costs. I want to do 3
 12 million a year in surgeries.

13 So, yeah, that's one of the
 14 reasons.

15 Q When did -- you may have
 16 said this earlier, but let me ask it
 17 again.

18 When did you start including
 19 the language in your solicitation
 20 materials that a hundred percent of
 21 all donations will go towards
 22 surgeries or surgery programs?

23 A I believe September of 2016.
 24 After the June board meeting, it was
 25 discussed.

1 BRIAN MULLANEY - VOLUME I
 2 MR. TRIVIGNO: Off the
 3 record.
 4 (Whereupon a Discussion is
 5 Held Off the Record.)
 6 MR. CURCHACK: I am now
 7 going to mark as the next exhibit
 8 a set of three difference
 9 solicitation packages, and I am
 10 going to refer you to the specific
 11 lines. You don't need to read the
 12 whole thing.
 13 If you look at the first
 14 one, which is dated August XX,
 15 2016, the one that starts with
 16 06087, and turn to 06088 and look
 17 at the paragraph that says begins
 18 with "We are very proud..."
 19 See where I am?
 20 THE WITNESS: Yes.
 21 (Exhibit 10 is Marked.)
 22 BY MR. CURCHACK:
 23 Q It says one of our founding
 24 donors pay for all of our non-program
 25 expenses so that all -- so that a

1 BRIAN MULLANEY - VOLUME I
 2 flip to page 06164.
 3 A Yep.
 4 Q It says we will use a
 5 hundred percent of our donation for
 6 our free surgery programs as opposed
 7 to our programs.
 8 A Right.
 9 Q Who would have drafted these
 10 solicitations?
 11 A Me.
 12 Q In your view, is there a
 13 difference between the wording --
 14 between the meaning of the wording in
 15 the two solicitations?
 16 A Well, I should have used the
 17 word "surgery" in the one before.
 18 Q Okay.
 19 This one says one of our
 20 founding donors is very generously
 21 paying all of our rent, admin and
 22 salaries.
 23 Is that different than all
 24 of our non-program expenses?
 25 A (Reviewing.)

1 BRIAN MULLANEY - VOLUME I
 2 hundred percent of all donations
 3 including yours can go towards
 4 programs.
 5 Who is that founding donor?
 6 A ██████████. He gives it to me
 7 in a year of unrestricted donations.
 8 Q When it says can go towards
 9 programs, I know this is a WonderWork
 10 solicitation. What does that mean?
 11 A (Reviewing.)
 12 It would be our surgery
 13 programs.
 14 Q Okay.
 15 A It is kind of vague, I
 16 admit. It should say surgery. I
 17 believe it said surgery on the
 18 stationery.
 19 Q Okay.
 20 We can look at the back page
 21 of it, and it says our free surgery
 22 programs.
 23 A Yeah.
 24 (Reviewing.)
 25 Q The next package, if you

1 BRIAN MULLANEY - VOLUME I
 2 So what page am I on here?
 3 Q If you look --
 4 A 06164.
 5 Q At -- 6164, yes, and compare
 6 it to --
 7 A One of our founding --
 8 (Reading) -- life changing
 9 surgeries -- (Reading) -- so...
 10 Q My question is simple. When
 11 you say in one case rent, admin and
 12 salaries and the other case
 13 non-program expenses, is there a
 14 difference between those two things?
 15 A (Reviewing.)
 16 Well, I am just pausing
 17 because it should be non-program, but
 18 our overhead is so low he could be
 19 paying for all of it. It's needlessly
 20 vague.
 21 It should be more buttoned
 22 up than it is. It's my fault. Should
 23 say program or non-program.
 24 Q If you look at page 9341,
 25 which is a 20/20/20 solicitation, it

1 BRIAN MULLANEY - VOLUME I
 2 says 100 percent of donation will go
 3 towards programs, zero percent goes to
 4 overhead or fundraising.

5 So it's yet another
 6 variation.

7 A (Reviewing.)

8 I didn't write this letter,
 9 not that it matters. I am still
 10 responsible for it.

11 Q Who would have written this
 12 letter?

13 A Our vendor.

14 Q Thanks.

15 A I --

16 MR. TRIVIGNO: You had a
 17 question before when he said he
 18 didn't write it.

19 THE WITNESS: It was
 20 100 percent go toward programs.
 21 It should say surgery programs
 22 too.

23 BY MR. CURCHACK:

24 Q And overhead or fundraising
 25 as opposed to rent, admin and

1 BRIAN MULLANEY - VOLUME I
 2 her but -- was this right after we got
 3 the judgment?

4 I am sure we did. We were
 5 in a mad rush to figure out what
 6 our -- that's what the auditors told
 7 us, you have to figure out what your
 8 restricted assets are. And I had no
 9 idea.

10 Q Why did they tell you you
 11 had to figure out what your restricted
 12 assets were?

13 A Because we were in
 14 bankruptcy.

15 Q You weren't in bankruptcy in
 16 October.

17 A No, but -- we were bankrupt
 18 in that we had a judgment against us,
 19 and we had no money to pay it.

20 Anyhow, so I don't know if I
 21 asked for it or not. I could have. I
 22 was trying to get a handle on our
 23 financial situation.

24 Q What does this chart seem to
 25 show to you?

1 BRIAN MULLANEY - VOLUME I
 2 salaries?

3 A (Reviewing.)

4 Yeah.

5 Q Is there a difference
 6 between those?

7 A No, it's a different way of
 8 saying the same thing.

9 (Exhibit 11 is Marked.)

10 BY MR. CURCHACK:

11 Q I would like to ask the
 12 reporter to mark as the next exhibit
 13 an e-mail dated October 21st from Hana
 14 Fuchs to Brian Mullaney, production
 15 number is 40124 and 40125 and there's
 16 a spreadsheet attached to the e-mail.

17 A (Reviewing.)

18 Q Do you recall seeing this
 19 e-mail and the attached spreadsheet?

20 A (Reviewing.)

21 Not specifically but I am
 22 not saying I didn't receive it.

23 Q Do you recall asking Hana to
 24 prepare this spreadsheet?

25 A I don't know if I did ask

1 BRIAN MULLANEY - VOLUME I

2 A (Reviewing.)

3 It shows no WonderWork
 4 donations, which is not good.

5 Q And it shows a \$4 million
 6 donation on the line that says Project
 7 Varanasi.

8 What is that?

9 A That is a hospital we had
 10 been trying to build for three years
 11 in Varanasi, India.

12 Q Did that donation, in fact,
 13 come in?

14 A No.

15 (Exhibit 12 is marked.)

16 BY MR. CURCHACK:

17 Q The next exhibit I would
 18 like to mark is Exhibit 12 and this is
 19 a 20/20/20 apparently -- an
 20 acquisition mailing for 20/20/20 dated
 21 April 14, 2015. It bears production
 22 numbers 02544 through 02555.

23 I will just ask you to look
 24 at page 25347.

25 A (Reviewing.)

1 BRIAN MULLANEY - VOLUME I
 2 Q See where it says at about
 3 2 percent, 20/20/20 has one of the
 4 lowest administrative costs of any
 5 major charity?
 6 A Hm-hm.
 7 Q How was that 2 percent
 8 calculated?
 9 A (Reviewing.)
 10 I do not know. I didn't
 11 write this letter but I approved it,
 12 so I don't know.
 13 I could find out for you.
 14 Q Okay.
 15 MR. LILIEN: Let's turn to
 16 page 2548.
 17 THE WITNESS: Yep.
 18 (Reviewing.)
 19 MR. LILIEN: There are a
 20 series of boxes that can be --
 21 that donors can check as
 22 indicating what level of giving
 23 they will do. The first box says
 24 \$300, which can provide one full
 25 eye surgery.

1 BRIAN MULLANEY - VOLUME I
 2 all about a girl -- it should be
 3 clearer.
 4 And we -- subsequent to
 5 this, we have changed the
 6 language, and I would like to send
 7 that to you, if I can.
 8 MR. TRIVIGNO: I think we
 9 probably have it.
 10 THE WITNESS: You probably
 11 have it.
 12 All right. We were always
 13 in this thing where they would say
 14 what does it cost and that is what
 15 it costs for a kid's thing, but we
 16 would haggle with our partners and
 17 pay a different amount and so the
 18 challenge was, well, do you tell
 19 the donors what it costs or do you
 20 tell them what you contribute and
 21 all that stuff.
 22 So six months or so ago we
 23 clarified the language to say this
 24 is what they cost and this is what
 25 our contribution is.

1 BRIAN MULLANEY - VOLUME I
 2 So the full line is enclosed
 3 is a generous gift in the amount
 4 of and in this case \$300 and the
 5 donor checks that box --
 6 THE WITNESS: Right.
 7 MR. LILIEN: -- which can
 8 provide one full eye surgery?
 9 THE WITNESS: Right.
 10 MR. LILIEN: Our
 11 understanding is an eye surgery
 12 for an adult, as I think you
 13 pointed out earlier is \$25.
 14 THE WITNESS: Right.
 15 Depending on the place. 25 or 35.
 16 Our contribution is 25, yeah.
 17 MR. LILIEN: So could you
 18 explain to us why this says \$300,
 19 which can provide one full eye
 20 surgery if all you are giving to
 21 hospitals is \$25?
 22 THE WITNESS: (Reviewing.)
 23 Well, it says children and
 24 adults, but you're right. The
 25 picture is of a child, and it's

1 BRIAN MULLANEY - VOLUME I
 2 MR. LILIEN: So.
 3 THE WITNESS: But I agree
 4 with you. It's misleading.
 5 MR. LILIEN: Regarding eye
 6 surgery for children, is \$300 the
 7 cost -- following up on your point
 8 now, is \$300 the amount you
 9 provide your partner hospitals?
 10 THE WITNESS: No, retail
 11 value is \$300 for a child to have
 12 surgery because they need general
 13 anesthesia. That's why it's so
 14 much more expensive.
 15 MR. LILIEN: What would you
 16 provide to the hospital?
 17 THE WITNESS: We contribute
 18 150 for every pediatric thing. We
 19 just changed that a year ago. We
 20 used to say, look, here is 30
 21 grand. Please make 2 percent of
 22 your surgeries kids, not adult.
 23 We didn't track it enough.
 24 Some would fall short. We stopped
 25 that practice a year ago and are

1 BRIAN MULLANEY - VOLUME I
 2 giving adult grants and that
 3 contribution is \$25 and the cost
 4 could be 25 to 35 to 50. It
 5 varies.
 6 In India, there's government
 7 reimbursement. In kids, it's
 8 pediatric grant. For a certain
 9 amount of kids, it's a certain
 10 amount of contribution.

11 BY MR. CURCHACK:
 12 Q When you say there's
 13 government reimbursement, does that
 14 mean the government is actually paying
 15 for the surgery?
 16 A It means they are making a
 17 contribution towards the surgery. We
 18 never pay the full cost of the
 19 surgery. We make a contribution
 20 towards it.
 21 Q And if you didn't make the
 22 contribution, would the government pay
 23 the full cost?
 24 A No. No. Depending on which
 25 partner you visit in India and ask,

1 BRIAN MULLANEY - VOLUME I
 2 with in India pay for the rest?
 3 THE WITNESS: Oh, we are
 4 never the only donor to that
 5 hospital. They have been doing it
 6 for 40 years. And they could have
 7 other NGOs from Europe or America
 8 supporting them.
 9 But it's a tough business
 10 and there are a lot of NGOs
 11 like -- there was a huge one that
 12 no longer does blindness. Helen
 13 Keller doesn't do cataract
 14 surgeries anymore. They give out
 15 vitamins.
 16 So a lot of times they will
 17 have support for ten years and
 18 then they will give away. So you
 19 have to be careful with the
 20 incremental thing because
 21 sometimes you are replacing
 22 funding for funding that they
 23 lost.
 24 And we are working on now --
 25 the \$400,000 gift is for another

1 BRIAN MULLANEY - VOLUME I
 2 does the government contribute, yes,
 3 they do.
 4 No, we ask for it, and we
 5 never get it stuff like that.
 6 MR. LILIEN: So what would
 7 happen --
 8 THE WITNESS: We are not
 9 displacing any money. That's
 10 something that I have been very
 11 aware of for my whole career, but
 12 we make a contribution that's fair
 13 and helping them generate
 14 incremental surgeries, so that we
 15 monitor what they are doing before
 16 we arrived and how many surgeries
 17 did you do last year, blah, blah,
 18 blah.
 19 MR. LILIEN: So what
 20 happens?
 21 You contribute say \$25 for a
 22 surgery.
 23 THE WITNESS: Yeah.
 24 MR. LILIEN: How does the --
 25 how does the hospital you partner

1 BRIAN MULLANEY - VOLUME I
 2 cloud-based repository, so that
 3 they will soon be sending us
 4 patient charts for every surgery.
 5 MR. LILIEN: Going back to
 6 where you said there are other
 7 NGOs that will fund and fund --
 8 the government may provide a piece
 9 of it as well?
 10 THE WITNESS: Right.
 11 MR. LILIEN: And hospitals
 12 may contribute --
 13 THE WITNESS: Yes.
 14 MR. LILIEN: -- some piece
 15 of it?
 16 THE WITNESS: Yeah.
 17 MR. LILIEN: What happens --
 18 you explained to me with the
 19 process, you contribute \$25.
 20 What happens if another NGO
 21 doesn't step up or government
 22 doesn't step up? Would you --
 23 would you pay the difference?
 24 THE WITNESS: You mean after
 25 the fact?

1 BRIAN MULLANEY - VOLUME I
 2 MR. LILIEN: You make a
 3 grant for \$25.
 4 What happens if the hospital
 5 cannot find another NGO or get
 6 government support.
 7 THE WITNESS: Typically what
 8 happens they do the surgeries.
 9 They do camps -- registration
 10 camps. They will put out radio
 11 ads, and I have been to them. As
 12 many as 1500 blind people will
 13 show up and register. They get
 14 screened. Of the 1,500, 800 have
 15 cataracts. They schedule their
 16 surgery and they do them.
 17 And then we come back to New
 18 York and say can we do another
 19 camp and we say no or we say yes
 20 and they don't do it unless they
 21 have the money to do the
 22 surgeries, whether it's coming
 23 from us or somebody else.
 24 So it really is just in time
 25 surgeries and it's based on

1 BRIAN MULLANEY - VOLUME I
 2 THE WITNESS: What do you
 3 mean maintain it? They are trying
 4 to get rid of the backlog.
 5 MR. LILIEN: Do they have a
 6 backlog --
 7 THE WITNESS: Yeah.
 8 MR. LILIEN: -- in a
 9 document?
 10 THE WITNESS: Yeah, it's
 11 really -- there's 12 million blind
 12 in India. Our partners
 13 collectively do about, I would
 14 guess 500,000 surgeries a year.
 15 MR. LILIEN: If we were to
 16 ask -- we are -- if we would ask
 17 one of the partner hospitals for a
 18 list of individuals on a waiting
 19 list or a backlog, they would have
 20 that document?
 21 THE WITNESS: The backlog is
 22 anecdotal, but a waiting list with
 23 names and stuff, I can get that
 24 for you.
 25 MR. LILIEN: Is it your

1 BRIAN MULLANEY - VOLUME I
 2 funding from us and every extra
 3 dollar we give them is more
 4 surgeries and then when we stop,
 5 it stops.
 6 BY MR. CURCHACK:
 7 Q Some of your mailings talked
 8 about waiting lists.
 9 A Yes.
 10 Q But if they are actually
 11 soliciting people to come to these
 12 camps --
 13 A Yeah.
 14 Q -- that would not seem like
 15 a waiting list to me.
 16 A Well, I can give you the
 17 lowdown on every hospital and get you
 18 more information out on that.
 19 Some of them have waiting
 20 lists and I always write "and huge
 21 backlogs," you know. But I can get
 22 you more information on that, if you
 23 want.
 24 MR. LILIEN: Do the
 25 hospitals maintain those backlogs?

1 BRIAN MULLANEY - VOLUME I
 2 understanding those lists -- those
 3 waiting lists are maintained by
 4 partner hospitals in the regular
 5 course -- in the ordinary course?
 6 THE WITNESS: It depends on
 7 the hospital. We do have surveys
 8 we send to our partners and ask
 9 them do you have waiting lists, do
 10 you have backlogs.
 11 But I will get that for you
 12 also. We have surveys monthly we
 13 send out to them and I will show
 14 you what they say.
 15 MR. LILIEN: To the best of
 16 your recollection, do you have --
 17 have you ever entered into an
 18 agreement with a hospital where
 19 you serve as effectively a
 20 guarantor where you agree to pay
 21 an amount beyond the original
 22 grant if the hospitals cannot find
 23 alternative funding to pay for the
 24 surgeries?
 25 THE WITNESS: No, not to my

1 BRIAN MULLANEY - VOLUME I
 2 knowledge, no. What we do here is
 3 25,000 bucks, send us your charts,
 4 let's see if you do a good job,
 5 and they come back and say we
 6 spent all the money, here is the
 7 names, here is the pictures, can
 8 we have another grant.
 9 And it's like hand to mouth.
 10 MR. LILIEN: Okay.
 11 Great.
 12 MR. POLKOWITZ: So the cost
 13 for an adult is \$300, you said?
 14 THE WITNESS: No.
 15 MR. POLKOWITZ: It's \$25?
 16 THE WITNESS: 25 to 35 to
 17 50, depending on the country, but
 18 around that.
 19 MR. POLKOWITZ: And then the
 20 child is?
 21 THE WITNESS: A standard
 22 cost would be \$300, because they
 23 need general anesthesia.
 24 MR. POLKOWITZ: I appreciate
 25 it.

1 BRIAN MULLANEY - VOLUME I
 2 section called overhead admin
 3 expenses.
 4 A Right.
 5 Q And it says total overhead
 6 admin -- the budget was 4.8 million.
 7 The actual is 5.9 million.
 8 Do you see that?
 9 A (Reviewing.)
 10 Yeah.
 11 Q If you go to the prior page,
 12 which is called FY'14 revenue summary,
 13 it says down at the bottom total
 14 revenue is 14 million --
 15 \$14.4 million, round numbers.
 16 Do you see that?
 17 A (Reviewing.)
 18 Total revenue, yeah.
 19 Q So on this report it says
 20 the overhead is almost \$6 million
 21 against \$14 million of revenue.
 22 What supports the claim that
 23 we saw earlier that said overhead is
 24 2 percent?
 25 A So that is the same time

1 BRIAN MULLANEY - VOLUME I
 2 THE WITNESS: We contribute
 3 150.
 4 MR. CURCHACK: The next
 5 exhibit is Exhibit 13, and it's a
 6 document that's called "Progress
 7 Report for the [REDACTED]
 8 [REDACTED]," dated July 2014.
 9 Do you recall seeing this
 10 report?
 11 THE WITNESS: (Reviewing.)
 12 (Exhibit 13 is Marked.)
 13 THE WITNESS: Yes.
 14 BY MR. CURCHACK:
 15 Q Were you involved in the
 16 preparation of this report?
 17 A Yep.
 18 Q If you could please turn to
 19 page 017986.
 20 A (Reviewing.)
 21 017986.
 22 Q It's called FY'14, expense
 23 summary.
 24 A Yeah.
 25 Q It says -- there's a line

1 BRIAN MULLANEY - VOLUME I
 2 frame as this.
 3 Q I believe it is -- the
 4 mailing date of that was in April of
 5 '15. This is fiscal '14.
 6 So it's the subsequent
 7 fiscal --
 8 A As I told you, I need to
 9 figure out how she calculated that.
 10 Q Okay.
 11 A I don't think our overhead
 12 is 2 percent. It was less than
 13 2 percent, but I don't know.
 14 Q You think it was less than
 15 2 percent?
 16 A No. No.
 17 Q Okay.
 18 A (Reviewing.)
 19 You know, the overhead for
 20 20/20/20 may have been calculated as
 21 different than the overhead for
 22 WonderWork.
 23 Q Could you explain that to
 24 us?
 25 A I am -- I'd rather get you

1 BRIAN MULLANEY - VOLUME I
 2 the accurate information.
 3 Q Why do you think it might
 4 have been calculated differently?
 5 A Well, we'd certainly get a
 6 different number if you did
 7 allocations per charity program and
 8 did overhead that way rather than just
 9 doing overhead for all the numbers.
 10 You could take the revenue
 11 for 20/20/20 and labor for 20/20/20
 12 and, you know, the marketing, but I am
 13 not -- I'd rather get you accurate
 14 information than guess.
 15 Q So you are saying there
 16 could be a different overhead
 17 percentage for 20/20/20, BurnRescue --
 18 A I know it would be
 19 different, but I don't know how.
 20 Q -- and WonderWork?
 21 A Yes. But also one thing I
 22 would say is the difference between 15
 23 and 14 -- this may have been the last
 24 year in '14 when we were spending huge
 25 amounts on direct mail, but, again, I

1 BRIAN MULLANEY - VOLUME I
 2 way they did.
 3 I will find out how they got
 4 the 2 percent, and I will share it
 5 with you.
 6 MR. LILJEN: We will wait
 7 for that.
 8 BY MR. CURCHACK:
 9 Q In your mind, what is an
 10 in-kind donation?
 11 A Oh. An in-kind donation can
 12 be a lot of different things. We had
 13 groups that gave us a million dollars'
 14 worth of free consulting a couple
 15 years ago, which was really valuable
 16 to us and it was the genesis of the
 17 whole IT project with the repository.
 18 We have a medical advisory
 19 board that donates their time. That's
 20 an in-kind donation of their time to
 21 us. That is a small number.
 22 The biggest number is an
 23 in-kind donation from surgeries where
 24 we are paying below market rate for a
 25 surgery that no one else would fill

1 BRIAN MULLANEY - VOLUME I
 2 don't want to guess.
 3 I would rather get you
 4 accurate information.
 5 MR. LILJEN: Brian, just to
 6 follow up on that.
 7 20/20/20 is not a legal
 8 entity?
 9 THE WITNESS: No, it's a
 10 DBA.
 11 BY MR. CURCHACK:
 12 Q And it has no employees. It
 13 doesn't rent out office space?
 14 A Right.
 15 Q It's --
 16 MR. LILJEN: It's all
 17 WonderWork?
 18 THE WITNESS: Right.
 19 MR. LILJEN: I want to make
 20 sure I understand what you are
 21 saying is that --
 22 THE WITNESS: I am trying to
 23 figure out how anyone can get the
 24 2 percent. And I didn't write
 25 that letter, but that may be one

1 BRIAN MULLANEY - VOLUME I
 2 the void.
 3 And that is the in-kind
 4 donation and we did that for 10 years
 5 at Smile Train. This year.
 6 Smile Train will record 58 million in
 7 in-kind donations from the surgeries.
 8 I don't know what our number
 9 was, but that is the concept.
 10 Q Explain to me how you
 11 understand that number is calculated.
 12 A The number is calculated by
 13 getting a fair value for the surgery
 14 or what the hospital could have
 15 charged or what -- the cost the
 16 surgery.
 17 So -- so we go to the
 18 hospitals -- as part of the
 19 methodology, we go to the hospital and
 20 say what is your cost for these
 21 cataract surgeries? They say \$60. We
 22 go we are giving you 25 for adult
 23 surgeries, and that would be a \$35
 24 in-kind donation.
 25 MR. LILJEN: What if they

1 BRIAN MULLANEY - VOLUME I
 2 receive the \$35 from another NGO
 3 or from the government?
 4 THE WITNESS: Yeah.
 5 Um, that is a good question.
 6 I don't know how we police that or
 7 we ask that.
 8 I don't know.
 9 BY MR. CURCHACK:
 10 Q And is the information that
 you base that on, the SurveyMonkey
 results that you mentioned earlier?
 11 A The SurveyMonkey is more
 like a partner annual thing, how are
 you doing, what do you like, what do
 you need.
 12 This is more at the end of
 the year.
 13 I think Tiffany just went
 through it for our new auditor's BDO
 and kind of verified the in-kind
 amounts and donations.
 14 Q Do you know when WonderWorks
 started including in-kind donations on
 its financial statements?

1 BRIAN MULLANEY - VOLUME I
 2 A I don't believe I have ever
 seen it, but I understand it. I know
 she does this, and we do this to be
 accurate when we figure out our
 in-kind --
 3 Q And she is "Hana"?
 4 A Yeah.
 5 Q And have you ever seen the
 chart that's attached?
 6 A No.
 7 Q As you look at it, can you
 tell what it is?
 8 A (Reviewing.)
 9 Yes.
 10 Q And what is it?
 11 A It's a survey of our
 partners to get their costs per
 surgeries, so we can figure out the
 accurate in-kind donations, I believe.
 12 Am I right?
 13 Q I don't know. I'm asking
 you, but thank you for your view.
 14 Do you know whether the
 partners who are --

1 BRIAN MULLANEY - VOLUME I
 2 A Probably -- we were a couple
 of years late. We should have done it
 the first year.
 3 I don't know.
 4 MR. CURCHACK: I would like
 to ask the reporter to please mark
 as Exhibit 14, a letter dated
 July 1, 2015, on WonderWork
 stationery. Production number is
 012929. It's addressed to Dear
 Sir or Madame, signed by Hana
 Fuchs, and attached to it is a
 multi-page spreadsheet that's not
 labeled, but I will ask you what
 it is.
 5 MS. SIMMONS: For the
 record, we removed two columns
 from it to make it more readable
 because it was one of these giant
 spreadsheets.
 6 (Exhibit 14 is Marked.)
 7 BY MR. CURCHACK:
 8 Q Do you recognize this
 letter?

1 BRIAN MULLANEY - VOLUME I
 2 A She didn't send this chart
 to all these people.
 3 Q I have no reason to --
 4 A She wouldn't share with
 other partners the prices.
 5 MR. TRIVIGNO: Do you think
 these were together?
 6 MS. SIMMONS: This is the
 collection of the responses.
 7 MR. CURCHACK: No.
 8 MS. SIMMONS: This is the
 collection of the responses.
 9 MR. TRIVIGNO: Got it.
 10 THE WITNESS: Okay.
 11 BY MR. CURCHACK:
 12 Q You believe this is done
 every year?
 13 A Yeah, it should be.
 14 Q Do you know if your partners
 are told how the information that they
 are responding with will be used?
 15 A I don't know. I don't think
 so, but I don't know.
 16 Q Do you know whether your

1 BRIAN MULLANEY - VOLUME I
 2 partners know that WonderWork
 3 considers the delta between their
 4 costs and your contribution to be
 5 deemed a donation?
 6 A I don't know.
 7 Q Again, you said this was
 8 done when you were at Smile Train?
 9 A Oh, yeah, and it's still
 10 done. In-kind donations are over
 11 \$50 million a year.
 12 Q Who whose idea was it?
 13 A To do this?
 14 Q Yes.
 15 A At Smile Train?
 16 Q Yes.
 17 A I don't know.
 18 Our auditors. I didn't even
 19 know what it was.
 20 MR. LILIEN: Would it be
 21 common for your auditors to
 22 propose to you ways of how to
 23 increase your amount of in-kind
 24 donations?
 25 THE WITNESS: To increase

1 BRIAN MULLANEY - VOLUME I
 2 sometime, but what were those
 3 volunteers doing?
 4 THE WITNESS: They were
 5 going -- they sent volunteer
 6 missions at Operation Smile. They
 7 were Americans that were taking
 8 two-week vacations and making a
 9 hundred grand a year or a surgeon
 10 making a million a year and they
 11 would have every person in their
 12 job and say, well, what would you
 13 had gotten paid those two weeks.
 14 MR. LILIEN: Those are
 15 volunteers to Operation Smile?
 16 THE WITNESS: To
 17 Operation Smile, yes.
 18 MR. LILIEN: And going on
 19 these missions on behalf of
 20 Operation Smile?
 21 THE WITNESS: Yes.
 22 MR. LILIEN: Understand.
 23 Okay.
 24 MR. CURCHACK: I would like
 25 to mark as the next exhibit a

1 BRIAN MULLANEY - VOLUME I
 2 it? You mean say don't make \$35,
 3 make it \$45?
 4 MR. LILIEN: To put it a
 5 little differently, would it be
 6 typical for your auditors to
 7 suggest to you ways of treating
 8 some of your donations on your
 9 financial statements?
 10 THE WITNESS: No, I don't
 11 think so.
 12 In thinking about this, I
 13 first learned about this when I
 14 was at Operation Smile, because
 15 they had thousands of volunteers,
 16 and they would apply a crazy
 17 hourly rate to those people --
 18 MR. LILIEN: Right.
 19 THE WITNESS: -- and come up
 20 with millions of dollars of
 21 in-kind donations. So it's a
 22 common term, theme, and we did
 23 it --
 24 MR. LILIEN: So I
 25 understand, I know it's been

1 BRIAN MULLANEY - VOLUME I
 2 composite of WonderWork field
 3 reports. I believe these -- the
 4 identification number is e-mail
 5 0009471.
 6 I believe they reflect
 7 reports of visits to facilities in
 8 Bangladesh, and these were
 9 identified by Ujjal when we spoke
 10 with him.
 11 I am going to ask you two
 12 questions about this.
 13 THE WITNESS: Did he tell
 14 you that his sister died of burns?
 15 (Whereupon a Discussion is
 16 Held Off the Record.)
 17 THE WITNESS: She was making
 18 dinner with her three kids and her
 19 sari caught on fire and burnt to
 20 death, three or four years ago.
 21 (Exhibit 15 is Marked.)
 22 MR. CURCHACK: He was
 23 working with you already?
 24 THE WITNESS: And the --
 25 maybe five years ago. He's a

1 BRIAN MULLANEY - VOLUME I
 2 great guy.
 3 This is where I just went.
 4 Okay.
 5 BY MR. CURCHACK:
 6 Q Okay.
 7 Now, I ask you turn, please,
 8 to page 947 -- sorry. It doesn't
 9 help. They have the same number on
 10 every page.
 11 Page 6.
 12 A (Reviewing.)
 13 Who needs eye surgery now?
 14 Page 6.
 15 Q I believe this is the report
 16 from the floating hospital.
 17 A Yes.
 18 Q Look at the heading -- the
 19 section headed "Finance."
 20 A (Reviewing.) Yes.
 21 Q I am going to read a
 22 sentence that says, "Target population
 23 is below 20 percent poor and cost of
 24 cataract surgeries is approximately
 25 \$35 on which some portion of the funds

1 BRIAN MULLANEY - VOLUME I
 2
 3 It depends on the channel
 4 that they come in. A direct mail
 5 retail donor we usually define it as
 6 500 or a thousand bucks.
 7 Someone who is a WonderWork
 8 donor who -- they are all kind of
 9 major donors, because they are all
 10 above that level. I would say a
 11 hundred thousand and up.
 12 Q What is the difference
 13 between a major donor and a -- not a
 14 major donor?
 15 A Well, we try to send better
 16 letters to the WonderWork donors. We
 17 can afford -- it's not that we just --
 18 but we can afford to use better
 19 stationery and first-class stamps and
 20 more pictures and spend more on a
 21 mailing to a WonderWork major donor
 22 than to someone who is sending us 50
 23 bucks a year.
 24 So when someone becomes a
 25 donor, direct mail, we mail them 18
 times a year to get one and a half

1 BRIAN MULLANEY - VOLUME I
 2 shared by patient."
 3 Now, I read that to mean
 4 that, in fact, the patient contributes
 5 to the cost of the surgery; is that
 6 correct?
 7 A Yes.
 8 Q So this would not be a free
 9 surgery?
 10 A Some of our partners have a
 11 sliding scale, and they charge their
 12 patients.
 13 Q Okay.
 14 If you turn to the report,
 15 five pages later, which is with
 16 respect to [REDACTED].
 17 A (Reviewing.) Yeah.
 18 Q Again, it says per surgery
 19 cost is \$35, and free patients pay
 20 partial cost.
 21 A Yes.
 22 Q Same answer there?
 23 A Yes.
 24 Q How do you define a major
 25 donor?

1 BRIAN MULLANEY - VOLUME I
 2 gifts. So those mailings are 34
 3 cents, 35 cents. That's all you can
 4 afford. We have over a hundred
 5 thousand types of those donors.
 6 But with the major donors,
 7 we can spend more on mail and I try to
 8 meet with them and fly to L.A. to meet
 9 with them or have dinner with them,
 10 call them on the phone, stuff like
 11 that.
 12 Again, it's almost like
 13 buying a series of spectrum from 25
 14 bucks up to a million bucks.
 15 Q If you were making one of
 16 those trips -- going out to dinner
 17 with one of these donors, who would
 18 pay for that, the trip or the dinner?
 19 A I am misunderstanding. A
 20 dinner on the trip, or are you saying
 21 who would pay for a trip for me to go
 22 to Bangladesh?
 23 Q No, a donor trip. If you
 24 are going to meet with a donor in Los
 25 Angeles --

1 BRIAN MULLANEY - VOLUME I
 2 A Oh.
 3 Q -- who would pay for the
 4 cost of the trip?
 5 A WonderWork would.
 6 Q And if you were taking a
 7 donor out to dinner, who would pay for
 8 the cost of the dinner?
 9 A WonderWork would, although
 10 sometimes I deduct it from my pay.
 11 MR. LILIEN: Let's take a
 12 two-minute break.
 13 (Whereupon a Recess
 14 Commenced at 6:14 and Testimony
 15 Recommenced at 6:17.)
 16 (Exhibit 16 is Marked.)
 17 MR. CURCHACK: Our next
 18 exhibit is Exhibit 16 and it
 19 consists of three -- four grant
 20 reports.
 21 (Whereupon a Discussion is
 22 Held Off the Record.)
 23 MR. CURCHACK: Back on the
 24 record.
 25 THE WITNESS: So that letter

1 BRIAN MULLANEY - VOLUME I
 2 A (Reviewing.)
 3 Q Do you recall this grant?
 4 A Yes.
 5 Q And were you involved in the
 6 preparation of this report?
 7 A I am sure I approved it.
 8 Q If you turn to page 11861.
 9 A (Reviewing.)
 10 Q It says under overview, "The
 11 end of November 2013, the [REDACTED]
 12 [REDACTED] honored us
 13 with a very generous grant of
 14 \$1 million. We distributed this grant
 15 immediately to WonderWork partner
 16 hospitals who had long waiting lists
 17 and the capacity to increase
 18 surgeries."
 19 Did I read that correctly?
 20 A (Reviewing.)
 21 Yep.
 22 Q Was that million dollars, in
 23 fact, distributed to partner
 24 hospitals?

1 BRIAN MULLANEY - VOLUME I
 2 with all the boxes, I want you to
 3 know we never did anything like
 4 that before. It was all part of
 5 this, hey, you guys have to figure
 6 out what is restricted and what
 7 isn't and we came to those donors
 8 and those amounts and we didn't
 9 know what to put.
 10 So we said -- we went to our
 11 lawyers and said can we just send
 12 them a letter and let them check
 13 the box so there won't be anyone
 14 second-guessing us or anything
 15 like that.
 16 That was the thought behind
 17 it.
 18 BY MR. CURCHACK:
 19 Q So this exhibit consists of
 20 four grant reports. Some cases they
 21 say final -- we will identify them as
 22 we go.
 23 The first one, which begins
 24 with production number 011860, it is
 25 called "Final Grant Report For the

1 BRIAN MULLANEY - VOLUME I
 2 A I believe so.
 3 Q Okay.
 4 Now, let's look at the [REDACTED] initial
 5 grant report, which is dated
 6 February 12, 2014, and it's just a
 7 one -- it's two pages, the front and
 8 back.
 9 If you look at page 11858,
 10 it says, "When? This grant was
 11 received December 31, 2013. A hundred
 12 percent of this money was distributed
 13 to WonderWork partners and partner
 14 hospitals on or before January 17,
 15 2014. All surgeries should be
 16 completed by June 2014."
 17 Do you see that?
 18 A Right.
 19 Q Do you recall this grant?
 20 A Yeah.
 21 Q And was that money, in fact,
 22 distributed to partner hospitals?
 23 A I believe so.
 24 Q Okay.

1 BRIAN MULLANEY - VOLUME I

2 Now, let's look at the final
 3 grant report for the [REDACTED]
 4 [REDACTED].

5 A [REDACTED].

6 Q [REDACTED], sorry. It begins
 7 with production number 012302.

8 A Right.

9 Q And let's look at page
 10 012291.

11 A Right.

12 Q And that says, "In
 13 February 2014, you honored us with a
 14 very generous pledge of \$4,000 to
 15 provide a thousand eye surgeries."

16 MR. LILIEN: 40,000.

17 MR. CURCHACK: 40,000.

18 Sorry.

19 BY MR. CURCHACK:

20 Q I will read it again.

21 "February 2014, you honored
 22 us with a very generous pledge of
 23 \$40,000 to provide a thousand eye
 24 surgeries," and I will leave out some
 25 words.

1

BRIAN MULLANEY - VOLUME I

2 Do you see that?

3 A Hm-hm.

4 Q Okay.

5 Now, each of these grants
 6 was received in fiscal year 2014; is
 7 that correct?

8 You have November 2013 for
 9 [REDACTED]; February -- I'm sorry,
 10 December 31, 2013, for Arnold;
 11 February 2014 for [REDACTED];
 12 September 2013 for [REDACTED].

13 A Okay.

14 Q So we got 1 million;
 15 500,000; 40,000; and 500,000 --

16 A (Reviewing.)

17 Q -- is that correct?

18 A Yes.

19 Q So that's a total of
 20 \$2,040,000.

21 Okay?

22 A Right.

23 MR. CURCHACK: I would like
 24 to mark as the next exhibit the
 25 WonderWork, Inc. Form CHAR-500 for

1 BRIAN MULLANEY - VOLUME I

2 "We distributed this grant
 3 to our partner [REDACTED], who
 4 was able to put this money to use
 5 immediately."

6 Do you see that?

7 A Hm-hm.

8 Q And do you recall receiving
 9 that grant?

10 A [REDACTED], yes.

11 Q Do you recall distributing
 12 that money to [REDACTED]?

13 A I assume we did, yes.

14 Q Last, I would like to refer
 15 to the final grant report for [REDACTED]
 16 [REDACTED], which is production
 17 number 012099, and this says -- first,
 18 do you remember receiving the [REDACTED]
 19 grant?

20 A Yep.

21 Q "As of September 2013, we
 22 received four grants from [REDACTED]
 23 [REDACTED] totalling \$500,000. Each of
 24 those was distributed immediately to
 25 WonderWork partner hospitals."

1

BRIAN MULLANEY - VOLUME I
 the fiscal year-ended June 30,
 2014. It begins at production
 number 0172 and runs through 0236.

5 THE REPORTER: 17.

6 (Exhibit 17 is Marked.)

7 MR. CURCHACK: And for the
 8 record, this consists of the New
 9 York CHAR-500 Form, attached to
 10 which is the Form 990 and attached
 11 to that is the audited financial
 12 statements for fiscal year 2014.

13 THE WITNESS: Okay.

14 BY MR. CURCHACK:

15 Q I ask you -- when you get
 16 that, look at page 0227. It is headed
 17 "Statement of Functional Expenses."

18 Okay?

19 A Yep.

20 Q Now, the first line on that
 21 table says grants, and this would be
 22 the amount that was distributed in
 23 grants by WonderWork during this
 24 fiscal year; is that correct?

25 A Right.

1 BRIAN MULLANEY - VOLUME I
2 Q The number on the chart is

3 \$1,543,055.

4 Is that right?

5 A Right. It doesn't match. I
6 will have to find out why. I don't
7 have an answer for you.

8 Do you want me to find out
9 why?

10 Q I would be interested in
11 knowing why you told these grants that
12 their money was distributed when
13 according to your audited financial
14 statement it apparently wasn't. So
15 yes, please.

16 A Okay.

17 Can I leave that exhibit and
18 take your copy?

19 MR. TRIVIGNO: Yeah.

20 MR. CURCHACK: I think this
21 is a good point to take a break.

22 (Whereupon Testimony
23 Concluded at 6:32 p.m.)

24
25

1 I, S. Arielle Santos, a Registered
2 Professional Reporter, Certified
3 Shorthand Reporter and Certified
4 LiveNote Reporter do hereby certify:
5 That prior to being examined, the
6 witness named in the forgoing
7 deposition, was by me duly sworn to
8 testify the truth, the whole truth,
9 and nothing but the truth.
10 That said deposition was taken before
11 me at the time and place set forth and
12 was taken down by me in shorthand and
13 thereafter reduced to computerized
14 transcription under my direction and
15 supervision, and I hereby certify the
16 foregoing deposition is a full, true
17 and correct transcript of my shorthand
18 notes so taken.

19 I further certify that I am neither
20 counsel for nor related to any party
21 to said action nor in anywise
22 interested in the outcome thereof.
23
24
25

A

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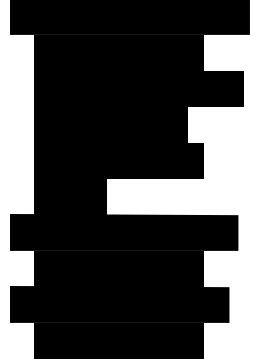
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MULLANEY

EXHIBIT 1

WonderWork Measuring Effectiveness Policy

WHEREAS, the WonderWork board of directors seeks to establish a policy on effectiveness assessment to help ensure that the organization has defined, measurable goals and objectives in place and a defined process in place to evaluate the success and impact of its program(s) in fulfilling these goals and objectives of the organization and that also identifies ways to address any deficiencies.

IT IS THEREFORE RESOLVED THAT the board of directors adopts the following policy:

1. At least once every two years, WonderWork will review its goals and objectives toward achieving its mission and will complete a performance and effectiveness assessment of its programs based on that review.
2. This first such assessment will be in June 2016 and will be conducted under the authority of the Audit Committee of the Board.
3. The WonderWork Board will receive a written report of this assessment:
 - a. Describing the activities that WonderWork undertook in the prior two years to achieve its goals and objectives.
 - b. Identifying the measures used to assess WonderWork's effectiveness in achieving its goals and objectives.
 - c. Analyzing the effectiveness of WonderWork's programs in achieving WonderWork's goals and objectives.
 - d. Recommending future actions WonderWork might take to increase effectiveness based on the findings.
4. At the conclusion of this process, WonderWork will revise its goals and objectives as needed for the upcoming term and will suggest means of measuring them.

EXHIBIT -1
Brian Mullaney
8/16/17
S. Arielle Santos, RPR, CSR
TransPerfect Legal

MULLANEY

EXHIBIT 2

From: Brian Mullaney [brian@surgery4thepoor.org]
Sent: Sunday, December 18, 2011 1:44 PM
To: Karen Lazarus; Hana Fuchs; DeLois Greenwood
Subject: good news bad news

Hi,

Good news is ██████████ just agreed to let us use his \$5 million as a matching grant. Thank God.

Bad news is ██████████ has reduced his grant from \$5 million to \$1 million IF we can resolve my lawsuit and Hana's lawsuit with Wang. (I am confident we can accommodate them.)

He did say that he will consider future funding which leads me to believe that if we can stay away from fighting with Wang and are successful, we will end up with the entire \$5 million he originally agreed to give us. He has made it clear he doesn't want to be part of any lawsuits or controversy and he and his lawyers will be watching us closely over the next year.

Now is not the time to be in court with Wang for any of us. We all have legitimate claims against him and smile train but fighting with him now will only undermine our efforts with Surgery For The Poor and tarnish all of our reputations.

Over the past year, because of conflict and turmoil with Charles Wang, Surgery For The Poor has lost...

- \$5,000,000 grant from ██████████
- \$5,000,000 grant from ██████████
- \$5,000,000 grant from ██████████
- \$4,000,000 from ██████████ and his offer to join our board and possibly be Chairman.
- Any chance of ever receiving support from ██████████
- Maybe \$1 million from ██████████, no word from them.

EXHIBIT -2

Brian Mullaney

8/16/17

S. Arielle Santos, RPR, CSR
TransPerfect Legal

If we do not resolve these two lawsuits we will lose the \$1 million grant ██████████ has promised to give us immediately, as well as any chance of future support and of course, having bill conway involved with us.

Look how much we have lost - \$19 million - because of Wang and that's BEFORE even going to court with him. A trial with Hana and or me would send all of our supporters running for the hills and all of our money would evaporate along with our reputations. Is any of this worth a lawsuit that at best will result in an award of a few hundred thousand dollars? Even a successful lawsuit will not lead to a 5 year payout as it is way too much, at most any of us would get 1 to 1.5 years of severance which is peanuts compared to what we will lose.

A lawsuit right now would be playing right into his hands – this is exactly what Wang wants, the chance to smear and slander us as we destroy ourselves. If he had any idea how much money he has cost us he would be thrilled. I know it is very frustrating to wait. And all of us would like to see wang go to jail. But we have to be smart about this and we have to put our own personal interests aside for the moment and consider our collective good. Like Franklin said during the revolutionary war, we must hang together or we will hang separately.

As you know, I have put my own interests on hold to build this new charity and so did all of you when you refused to sign the original severance deals 10 months ago. I had a handshake deal back in May and asked them to include all three of you. Back in february my lawyer said he could get me a lot of money if I agreed to support the merger instead of fighting it. The new deal they want me to sign is very bad compared to my current deal and I literally am forgoing more than half a million dollars that they promised me. I agreed to do that so that you three would get the severance deals you deserve. And even though my lawyer says I have a good chance if I appeal my lawsuit with Wang, I am folding my tent to appease ██████████ and sending Wang \$650,000 next week.

I am confident that we will all be able to settle with the regime that follows Wang whenever that is! One way or another, I do not envision him running smile train for another year. Smits has told me several times that Wang has said he doesn't want to run Smile Train.

If for some reason, Wang does continue to run Smile Train, any and all of us could sue him and Smile Train in six – 12 months

if we wish once Surgery For The Poor is more established and we have donors, start-up capital, and of course some success with blindness. Smits advised me to sue smile train in federal court which he says refers just about everything to mediation, he said I would win quickly and easily. We can sue him when we are in a position to weather the storm.

Right now, we have much more to lose than Wang does.

As a small token of appreciation for all of you not signing those wicked severance agreements and joining surgery for the poor I am going to give all of you a \$15,000 year end bonus once we receive the [REDACTED] grant in January to help you with your legal fees.

This money is NOT coming from donations or donors but from our services contract with Ueltschi.

Please let me know what you think.

Thanks,

Brian

Brian Mullaney
Co-Founder
Surgery For The Poor
420 Fifth Avenue, 27th Floor
New York, New York 10018
email brian@surgery4thepoor.org
tel 646-558-3768
cell 917-902-7550
www.surgery4thepoor.org



TIME magazine named Surgery For The Poor one of "10 Ideas That Can Change The World"

MULLANEY

EXHIBIT 3

EXHIBIT -3

Brian Mullaney

8/16/17

S. Arielle Santos, RPR, CSR
TransPerfect Legal**From:** Karen Lazarus [karen@wonderwork.org]**Sent:** Friday, February 12, 2016 2:53 PM**To:** Brian Mullaney**CC:** DeLois Greenwood; Hana Fuchs**Subject:** Re: Better Business Bureau**Attachments:** X_BBB_WWBrocure-AnnualReport_reduced_FY14.pdf; X_BOD_EffectivenessPolicy[1].docx; X_BBB_applicationDRAFT_Feb12,2016.pdf

Hi Brian, here's the Draft Annual Report with the pages we discussed. Since it's FY2014, I've used the MAB and BOD from that period. However, I did put asterisks for those people who are no longer with the organization. The Effectiveness Policy attached is from a template provided by the BBB that I modified a bit.

I've also attached a PDF of the application so you can see the changes I incorporated as of our last email exchange yesterday.

Below are a couple remaining questions/follow up comments:

Page 2 – Mission Statement. (*"Please state your organization's purpose/mission statement as it appears in your articles of incorporation, by laws, and/or other office source"*):

WonderWork provides free, life-changing surgeries for children and adults who are blind, severely burned or crippled with clubfoot. Instead of sending American doctors on missions, WonderWork empowers local doctors through free training, equipment and financial aid. **This is our standard mission statement we usually use. However, if we take it from an official source, per BBB, see below.**

Per 990:

WonderWork provides treatment, surgery and related assistance to children and adults everywhere including those in developing countries, suffering from disease, illness or disability.

Per Articles of Incorporation:

WonderWork provides treatment, surgery, and related assistance to children and adults everywhere, including those in developing countries, suffering from disease, illness, or disability, including but not necessarily limited to blindness, club foot, hydrocephalus, pediatric cardiac surgery, and burns; and to further support medical institutions and other charitable organizations engaged in the provision of these services; as well as to educate doctors and the public on potential treatments and surgical techniques, and creating general awareness of these disabilities and available treatments.

=====

Page 2 – Principal Program Service Activities – I have revised again per your comments below.

WonderWork is focused on 3 medical problems that affect tens of millions of poor children and adults in the developing world. Each problem can be easily solved through a simple surgery or procedure that takes very little time and costs very little money:

Blindness: 20 million children and adults who are blind today could see tomorrow if they received a 15-minute surgery. But most of them they are too poor to afford it. The eye surgery we provide can restore the eyesight of a blind child or adult in as little as 15 minutes.

Clubfoot: 2 million children in the world who are suffering with clubfoot could be cured through a miracle cure. A series of casts straighten the feet in just 6 weeks. Then the child wears a brace at night for several years to keep them in line. This cure is 95% effective.

Burns: 15 million children who have been severely burned can be transformed through surgery that can separate skin that has been fused together. This new freedom of movement can be a lifesaver for a child or adult who has been deformed and crippled by severe burns.

Most of the patients we treat live below the global poverty line of \$1.25/day. Most have never seen a doctor before. The

vast majority of them could never even afford the surgery they need without help from organizations like WonderWork.

To maximize our reach, WonderWork has formed partnerships with 75 hospitals and organizations that are helping children and adults in 60 of the world's poorest countries. Instead of sending doctors on 2-week missions, but rather by providing local doctors crucial financial support, we empower them to help children and adults in their own communities. Local surgical teams can provide ten times as many surgeries as a mission group can – for one-tenth the cost.

As the safety of our patients is our #1 priority, our WonderWork medical partners are selected based on their experience, credentials and ability to deliver quality clinical care. We also have a Medical Advisory Board which is composed of the best and brightest surgical experts in the world. They help evaluate and set the standards for safety and quality for all medical programs.

To date, WonderWork has helped provide more than 135,000 surgeries to children and adults who are blind, severely burned and crippled with clubfoot.

=====

Page 4 - didn't we have a board meeting in both October and December, 2015? You say our last meeting was 9 months ago. I AM USING THE BOARD MEETING IN THE LAST COMPLETED FISCAL YEAR. THIS IS APPARENTLY WHAT THEY WANT, AS I ALREADY CONFIRMED THIS.

Where does it say that? And if that is so, I am not the Chairman as I wasn't during the last fiscal year. Are you sure about this? My BBB contact had told me over the phone to use the last completed fiscal year (it's not clear what to use). If I try to list more than the most recently completed fiscal year, I get the following error message: **There is a problem with the information in this section: List board meetings in question 3 only if they fall within your last fiscal year.**" Regarding your question about the board positions, true, you were not Chairman in the last fiscal year, however, the questions seem to indicate that the most current information is needed. I can confirm this with my BBB contact. The form does not make this very clear.

=====

Page 5 – outside consulting firms

The question is "In the past year, did your organization hire any of the following:" To me, this means "past fiscal year" however, I will verify with my BBB contact. Again, the form is somewhat vague with regards to which year(s) to use. As you said, we hired CDR in December 2014.

=====

Page 5 – comments regarding compensation – my revision below.

WonderWork engaged a leading executive compensation firm to provide competitive compensation data and analysis for our CEO. This firm deemed our CEO's compensation was fair and reasonable. His compensation is also approved by our Board.

=====

Regarding the references to "more than one program activity," this has been adjusted in those 2 places.

=====

Regarding the "call to action" for the Joint Costs, I updated the response (which I believe you already saw in yesterday's email), but including it again, just in case:

For blindness, we asked the recipient to follow a variety of simple steps for maintaining healthy eyes: have a comprehensive dilated eye exam, know your family's eye health history, eat right to protect your sight, maintain a healthy weight, quit smoking or never start, wear protective eyewear, give your eyes a rest. etc.

For burns, we told the recipient how they can prevent fires and burns by doing some of the following: installing smoke alarms in one's home, practice getting in and out of the house through various exits, avoid wearing loose-fitting clothes while cooking, never smoke in bed or leave burning cigarettes unattended, etc. We also told the recipient what to do as well as what not to do when treating burns.

For clubfoot, we asked the recipients to seek treatment in the first week or two of life if a baby is born with clubfoot; as well as signs to watch for during and after treatment. We explained to recipients what happens if the clubfoot goes untreated or what can happen if it relapses. We explained different treatment options from casting to surgery, as well as the various risks involved.

From: Brian Mullaney <brian@wonderwork.org>

Date: Thursday, February 11, 2016 2:57 PM

To: Karen Lazarus <karen@wonderwork.org>

Cc: DeLois Greenwood <delois@wonderwork.org>, Hana Fuchs <hana@wonderwork.org>

Subject: Re: Better Business Bureau

Thanks – my comments below.

From: Brian Mullaney <brian@wonderwork.org>

Date: Thursday, February 11, 2016 12:22 PM

To: Karen Lazarus <karen@wonderwork.org>

Cc: DeLois Greenwood <delois@wonderwork.org>

Subject: Better Business Bureau

Hi,

Here are just a few comments on the paper version you gave me this week....

You say 9 employees. I count

1. Brian
2. Delois
3. Karen
4. Hana
5. Janet
6. Vera
7. Tiffany
8. Angie
9. Ujjal – **HANA DOES NOT COUNT UJJAL AS AN EMPLOYEE, SINCE HE'S A CONSULTANT.**
10. Michele

I would not count Mike Schell as it is so infrequent. **WE DIDN'T.**

Page 2 – they ask for program service activities – what we do. You talk about three areas – that is good. THEY WANT IT TO BE NO LONGER THAN 250 WORDS. BELOW IS WHAT I WROTE IN THE BOX. I ADDED A LITTLE ADDITIONAL LANGUAGE IN RED WHICH BUMPS IT UP OVER THE 250 WORDS, BUT I THINK THAT WON'T BE A BIG PROBLEM.

You have a lot of generic stuff about the problems and solutions.

They want to know what WE DO. How we work. You never mention empowering local surgeons, providing financial support, training, equipment, etc.
Medical advisory board. Etc.

WonderWork is focused on 3 medical problems that affect tens of millions of poor children and adults in the developing world. Each problem can be easily solved through a simple surgery or procedure that takes very little time and costs very little money:

Blindness: 20 million children and adults who are blind today could see tomorrow if they received a 15-minute surgery. But most of them they are too poor to afford it. The eye surgery we provide can restore the eyesight of a blind child or adult in as little as 15 minutes.

Clubfoot: 2 million children in the world who are suffering with clubfoot could be cured through a miracle cure. A series of casts straighten the feet in just 6 weeks. Then the child wears a brace at night for several years to keep them in line. This cure is 95% effective.

Burns: 15 million children who have been severely burned can be transformed through surgery that can separate skin that has been fused together. This new freedom of movement can be a lifesaver for a child or adult who has been deformed and crippled by severe burns.

WonderWork has formed partnerships with 75 hospitals and organizations that are helping children and adults in 60 of the world's poorest countries. Instead of sending volunteer American doctors on 2-week medical missions, these life-changing surgeries are provided by local surgeons so that they can help the people in their communities.

As the safety of our patients is our #1 priority, our WonderWork medical partners are selected based on their experience, credentials and ability to deliver quality clinical care. We also have a Medical Advisory Board which is composed of the best and brightest surgical experts in the world. They help evaluate and set the standards for safety and quality for all medical programs.

To date, WonderWork has helped provide more than 135,000 surgeries to children and adults who are blind, severely burned and crippled with clubfoot.

I wasn't complaining about length. I was pointing out that they wanted to know what we do and you talk about everything but that. The only thing you say that we do is form partnerships and we have a MAB. You don't say what we do or how we do it. You never even say we empower local surgeons in developing countries which is our core program.

Page 4 – didn't we have a board meeting in both October and December, 2015? You say our last meeting was 9 months ago. **I AM USING THE BOARD MEETING IN THE LAST COMPLETED FISCAL YEAR. THIS IS APPARENTLY WHAT THEY WANT, AS I ALREADY CONFIRMED THIS.**

Where does it say that? And if that is so, I am not the Chairman as I wasn't during the last fiscal year. Are you sure about this?

We have not hired any outside fundraising firms in past 12 months. (We hired CDR in December, 2014.) **I WAS USING THE**

PAST "FISCAL YEAR" NOT CALENDAR. I GUESS THIS IS A BIT OF A TOSS UP. HOWEVER YOU WANT TO GO, SEEMS HARMLESS EITHER WAY.

You have to be consistent – can you please show me where they say answers should be for last fiscal year? How did you “confirm” that?

Page 5 - yes I believe the board sees the auditors management letter – check with Hana. I CHECKED WITH HANA A SECOND TIME AND SHE CONFIRMED THAT "THERE WERE NO RECOMMENDATIONS, THEREFORE NO LETTER."

NOTE PER BBB: The auditor's "management letter" refers to a letter of recommendation written to the charity's board of directors that includes any relevant auditor recommendations regarding accounting practices such as internal controls, operating procedures, and/or overall accounting policies. This letter should not be confused with the "auditor's opinion" which is part of the audit report.

Don't know why you include comments regarding compensation – what you wrote is about my duties not compensation plus I do not know what “surgical scalability” is. **I THOUGHT THAT WE SHOULD MENTION HOW YOU ARE ESSENTIALLY RESPONSIBLE FOR ALL ASPECTS OF THE ORGANIZATION FROM FUNDRAISING TO PROGRAMS, ETC.. IF YOU FEEL THIS COMMENT IS UNNECESSARY, NOR HELPFUL, TO SUPPORTING YOUR TOTAL COMPENSATION, WE CAN REMOVE IT. IT IS NOT A REQUIRED COMMENT.**

wouldn't it be more relevant to state it was reviewed and deemed fair and reasonable by an independent compensation expert ir what ever they call those folks?

Page 9

Does your organization have more than one major program activity? You wrote no – don't we have several major program activities? Surgery? Public Information? Building a hospital? **I HAVE ADJUSTED THIS. YOU ARE CORRECT. I THOUGHT "SURGERY" WAS OUR SOLE PROGRAM ACTIVITY AND NEGLECTED PUBLIC INFORMATION (HOSPITAL WOULD BE AN ACTIVITY FOR THIS COMING YEAR). THEY DON'T ASK TO LIST REGARDLESS.**

Page 10 - they are asking what the call to action is from “joint activity” and you do not list one. Take care of their eyes, avoid.... Be careful around fires, etc. Look at our materials and include all the good advice and call to actions we include in all three causes. **ORIGINALLY I HAD ONLY INCLUDED BLINDNESS BECAUSE I WAS THINKING OF WHAT WE DO CURRENTLY, BUT GOING BACK TO 2014, YOU ARE CORRECT, WE NEED TO INCLUDE ALL CAUSES. BELOW IS MY ADJUSTED COPY.**

For blindness, we asked the recipient to follow a variety of simple steps for maintaining healthy eyes: have a comprehensive dilated eye exam, know your family's eye health history, eat right to protect your sight, maintain a healthy weight, quit smoking or never start, wear protective eyewear, give your eyes a rest. etc.

For burns, we told the recipient how they can prevent fires and burns by doing some of the following: installing smoke alarms in one's home, practice getting in and out of the house through various exits, avoid wearing loose-fitting clothes while cooking, never smoke in bed or leave burning cigarettes unattended, etc. We also told the recipient what to do as well as what not to do when treating burns.

For clubfoot, we asked the recipients to seek treatment in the first week or two of life if a baby is born with clubfoot; as well as signs to watch for during and after treatment. We explained to recipients what happens if the clubfoot goes untreated or what can happen if it relapses. We explained different treatment options from casting to surgery, as well as the various risks involved.

Page 11 – we have more than one program activity.

YES, ADJUSTING THIS AS WELL. WE WILL NEED TO PROVIDE THE "PROGRAM ACTIVITY" FY16 BUDGET BREAKOUT. HANA IS LOOKING AT THIS NOW.

Thanks

b

Brian Mullaney
Co-Founder/CEO

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www.WonderWork.org

Watch two blind sisters see their mom for the first time!

More than 7,500,000 people have watched this heart-warming video so far. It was the #1 watched video on the National Geographic website for 2014.



TIME magazine named WonderWork "One of 10 Ideas That Can Change The World."

MULLANEY

EXHIBIT 4

From: "Brian Mullaney"
Subject: Re: better business bureau
Sent: Tue, 2 Feb 2016 18:40:39 -0400
[2F5A9E35-4EF5-4412-BCC3-947F8754FA19\[1\].png](#)
[2F5A9E35-4EF5-4412-BCC3-947F8754FA19\[6\].png](#)

From: Brian Mullaney [brian@wonderwork.org]
Sent: Tuesday, February 02, 2016 1:41 PM
To: Karen Lazarus
Subject: Re: better business bureau

Okay please make minutes out of the following.

Board meeting began - ?

Board accepted resignation of Ted Dysart,
Board discussed credentials of new board member prospects.
Mullaney nominated following LIST THEM and they were unanimously approved with staggered terms as follows.
Please make a suggestion as for Class Of....

Board approved the following:

JJ Coney will serve as the lead Independent director and Secretary

Mullaney will serve as Chairman and CEO.

Ravi Kant will serve as Treasurer.

Board approved re-scheduling next board meeting from Feb _? To march _____? At 10:00am.

Thank you.

Board meeting ended - ?

Brian Mullaney

Co-Founder/CEO

WonderWork
420 Fifth Avenue, 27th Floor
New York, NY 10018
tel: 212.729.1855
cell: 917.902.7550
email: brian@wonderwork.org
www.WonderWork.org

EXHIBIT -4

Brian Mullaney

8/16/17

S. Arielle Santos, RPR, CSR
TransPerfect Legal

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From: Karen Lazarus
Date: Tuesday, February 2, 2016 at 1:00 PM
To: brian mullaney
Subject: Re: better business bureau

WW_EMAILS0254693

Okay, thanks for the clarification on the BBB application. Regarding minutes, correct, I only have Ravi's comments incorporated into the

revised draft. Never saw anything from Ted. Regarding the short January call, I don't have any feedback on the minutes.

From: Brian Mullaney <brian@wonderwork.org>
Date: Tuesday, February 2, 2016 11:54 AM
To: Karen Lazarus <karen@wonderwork.org>
Subject: better business bureau

It looks good, please complete and let me see before we submit.

fyi: jj woukld not serve as chairman so I am interim chairman for a year when we will select one of our new directors.

Ravi is treasurer, JJ coneys is lead director and secretary, I am chairman and ceo.

I have you comments on minutes from ravi but not ted right?

Also, I never sent you minutes from our short january conferece call meeting right?

Thanks

B.

Brian Mullaney

Co-Founder/CEO

WonderWork

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New York, NY 10018

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MULLANEY

EXHIBIT 5

From: Brian Mullaney [brian@wonderwork.org]
Sent: Wednesday, December 07, 2016 1:58 PM
To: Hana Fuchs
Subject: Re: Review of WW donors

Hana,

Please call me right away.

b

Brian Mullaney
Co-Founder/CEO

WonderWork
411 Fifth Avenue, Suite 702 NEW ADDRESS!
New York, NY 10016
tel: 212.729.1855
cell: 917.902.7550
email: brian@wonderwork.org
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TIME magazine named WonderWork "One of 10 Ideas That Can Change The World."

From: Hana Fuchs <hana@wonderwork.org>
Date: Wednesday, December 7, 2016 at 1:55 PM
To: Brian Mullaney <brian@wonderwork.org>
Cc: Kimberly Johnson <kimberlyjohnson@KPMG.com>
Subject: Review of WW donors

Hi Brian,

We went through the WW donations for FY16 and came up with the following:

Of the total WW donations, we have already restricted [REDACTED]
We can reclassify \$255,849.18 from WW to blindness restriction based on grant proposals.
We can also reclassify \$10,975 to blindness based on web donations that were restricted.
If we restrict [REDACTED] funds – did he sent a letter?, we have \$1,925,179 remaining.

EXHIBIT -5

Brian Mullaney

8/16/17

S. Arielle Santos, RPR, CSR
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5,592,003.38	total WW donations
1,000,000.00	[REDACTED] time restricted over 10 years
400,000.00	[REDACTED] restricted to database already
255,849.18	blindness surgeries - grant proposal
10,975.00	web donations restricted to blindness
3,925,179.20	remaining WW funds for the mission
2,000,000.00	[REDACTED]
1,925,179.20	

The WW letters sent to these \$1.9 million remaining donors asks them to fund surgeries in support of our mission.

This amount is restricted to our mission however according to GAAP (generally accepted accounting principles) this amount is unrestricted on our balance sheet. This is what our charity does.

We have been accounting for this correctly in the past based on GAAP.

It may be beneficial to have Kim speak with Jeremy from the law firm to explain this to him.

Let me know if you have any questions.

Thanks, Hana

Hana Fuchs
Chief Financial Officer
WonderWork

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New York, NY 10016
tel: 212.729.1855 ext. 103
email: hana@wonderwork.org
www.WonderWork.org



TIME magazine named WonderWork "One of 10 Ideas That Can Change The World."

MULLANEY

EXHIBIT 6

From: Brian Mullaney [brian@wonderwork.org]
Sent: Tuesday, December 06, 2016 3:18 PM
To: Mann, Pamela A.; Hana Fuchs
CC: Johnson, Kimberly; Steckel, Jeremy S.
Subject: Re: intro to our Audit Partner from KPMG

Hi All,

We had a good talk today with Kimberly.

I told her that I think we have been doing our restrictions wrong for the past few years. For some reason, we were restricting all of our retail direct mail donations that came in to the lockbox in special envelopes – but not restricting any of the donations that come in from major donor mailings.

These major donor mailings ask NOT for general purpose gifts but for donations to support our free surgery programs. On the stationery which these major donor letters are written on say all of your donations will go towards programs.

Anyhow, Kimberly has to think this over. But in the meantime, she has asked us to go over all donations raised in fy 2016 and match appeals with donations for major donors to show that they were asked for specific support – and just “support our mission.” If you look at the major donor letters we have provided with the egypt link, the very first letter could not be more specific.

I write most if not all of the direct mail letters and I have never written a “support our mission” letter.

If we can confirm this it would mean that 99% of our funds are restricted donations.

We will keep you posted.

Thanks,

Brian

Brian Mullaney
Co-Founder/CEO

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EXHIBIT -6

Brian Mullaney

8/16/17

S. Arielle Santos, RPR, CSR
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TIME magazine named WonderWork "One of 10 Ideas That Can Change The World."

From: "Mann, Pamela A." <Mann@clm.com>
Date: Tuesday, December 6, 2016 at 3:08 PM
To: Hana Fuchs <hana@wonderwork.org>
Cc: Brian Mullaneyo <brian@wonderwork.org>, Kimberly Johnson <kimberlyjohnson@KPMG.com>, "Steckel, Jeremy S." <Steckel@clm.com>
Subject: RE: intro to our Audit Partner from KPMG

Thanks, Hana. I will be working with Jeremy on all these financial things, so I've copied him here. Kimberly, we look forward to being in contact with you.

Pamela A. Mann
Carter Ledyard & Milburn LLP
2 Wall Street
New York, NY 10005
Direct: 212-238-8758
General: 212-732-3200
mann@clm.com

From: Hana Fuchs [mailto:hana@wonderwork.org]
Sent: Tuesday, December 06, 2016 1:29 PM
To: Mann, Pamela A.
Cc: Brian Mullaney; Johnson, Kimberly
Subject: intro to our Audit Partner from KPMG

Hi Pamela,
I wanted to introduce to our Audit Partner from KPMG, Kimberly Johnson. She may be giving you a call in the near future to discuss our ongoing concerns and issues with the Help Me See arbitration and rulings.
Let me know if you have any questions.
Regards, Hana

Hana Fuchs
Chief Financial Officer
WonderWork

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MULLANEY

EXHIBIT 7

From: Brian Mullaney [brian@wonderwork.org]
Sent: Wednesday, December 07, 2016 9:54 AM
To: Hana Fuchs
Subject: Re: important

This is for major donors – and we need every penny so please just don't research the large gifts!
We need to document that every major donor gift – with the exception of [REDACTED] – came in response to a specific ask so that all of that money is restricted.
This is the most important part of our case right now.
Please supervise and make sure this is done quickly and correctly.
Thanks
b

Brian Mullaney
Co-Founder/CEO

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TIME magazine named WonderWork "One of 10 Ideas That Can Change The World."

From: Hana Fuchs <hana@wonderwork.org>
Date: Wednesday, December 7, 2016 at 9:47 AM
To: Brian Mullaney <brian@wonderwork.org>
Subject: RE: important

Hi Brian,
I spoke with Kimberly yesterday and she suggested researching the larger WW gifts from FY16. Karen, Janet and Vera and looking into matching them with a specific ask.
Will update you as soon as we have done this.
Thanks H

From: Brian Mullaney
Sent: Wednesday, December 07, 2016 9:21 AM
To: Hana Fuchs
Subject: important

Hi Hana,

Ensuring that the currently unrestricted monies on our balance sheet really are restricted by researching where they

EXHIBIT -7
Brian Mullaney
8/16/17
S. Arielle Santos, RPR, CSR
TransPerfect Legal

came from and from what appeals is critically important.

Please work on this full-time and keep me posted.

Let's get a review of all FY 2016 donations done as soon as you can and speak again with Kimberly.

Don't worry that we have been doing it wrong as that is my fault and I appreciate your intentions to have as much unrestricted money as possible.

But the truth is that the vays majority of these funds came in from specific appeals in which these major donors were told their donations would be used for surgeries.

And we need to correct our books to reflect that.

Thank you.

b

Brian Mullaney
Co-Founder/CEO

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MULLANEY

EXHIBIT 8

Miracle surgeries for children.
**wonder
work**

"...one of 10 ideas that will change the world."

- TIME

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Richard Price
Chief Executive, Asia Pacific,
CBRE Global Investors

Mark Atkinson
Creative Director, Oito

Tannen Ann Ziff
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Tuck School at Dartmouth

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Christie Brinkley
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Howie Mandel
Comedian

Mariska Hargitay
Actor

Alex Trebek
Host of Jeopardy!

Bette Midler
Entertainer

Chris Meloni
Actor

Candice Bergen
Actor

Jane Kaczmarek
Actor

Sir Ben Kingsley
Actor



April 7, 2017

Dear [REDACTED],

We want to make sure we use your very generous donation of \$50,000 that we received on 5/24/2016 in accordance with your wishes.

Could you please take just a moment and check a box below, sign underneath, and send this back to us in the enclosed, stamped, self-addressed envelope? If easier, you may email me a PDF copy at brian@wonderwork.org.

I would greatly appreciate it!



Please use my donation for any of your surgery programs.



Please use my donation for blindness surgery programs.



Please use my donation for burn surgery programs.



Please use my donation for clubfoot surgery programs.



Please use my donation for general support.



4.14.17

Date

Name:

Thank you so much for your help with this - and as always - for your very generous support.

WE COULD DO NOTHING WITHOUT IT!

With gratitude,

Brian
212-720-1859
brian@wonderwork.org

P.S. If you have any questions, email me at brian@wonderwork.org or call me on my cell: 917-902-7550. Thank you very much!

EXHIBIT -8

Brian Mullaney

8/16/17

S. Arielle Santos, RPR, CSR
TransPerfect Legal

MULLANEY

EXHIBIT 9

P.O. Box 9669, Washington, DC 20090-9669

20|20|20

RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

Brian Mullaney
Co-Founder



One donation from you can restore
the eyesight of a blind child.
(And we'll never ask you for another.)

EXHIBIT -9
Brian Mullaney
8/16/17
S. Anelle Santos, RPR, CSR
TransPerfect Legal

WON-EX 9021

Send us a donation and we'll never ask for another!

WON-EX 9022

Return Address

Attention: Brian

20/20/20
P.O. Box 96669
Washington, DC 20090-6669

10A 104-077935357

IWCG Job No: 2013080
Component: RAEL

Project: WW 20/20 April Acquisition
Size: #9 Stock: white Ink: 11; PMS 329 Green

Date: 03/15/13 Stage: HNAI

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Information About Cloudy Lenses and Your Vision

them in childhood, often in both eyes. These may not affect vision. If they do, the lenses may need to be removed. **Radiation** — A cloudy lens can develop after exposure to some types of radiation.

What are the causes of a cloudy lens?

The lens of the eye is normally clear. It acts like the lens on a camera, focusing light as it passes to the back of the eye. Until a person is around age 45, the shape of the lens is able to change. This allows the lens to focus on an object, whether it is close or far away. As we age, proteins in the lens begin to break down and the lens becomes cloudy. What the eye sees may appear blurry. This condition is known as a cloudy lens. Factors that may speed up cloudy lens formation are:

- Diabetes.** Smoking; Eye inflammation; Eye injury; Family history of cloudy lens; Long-term use of corticosteroids (taken by mouth) or certain other medications; Radiation exposure; Surgery for another eye problem; Too much exposure to ultraviolet light (sunlight). In many cases, the cause of a cloudy lens is unknown.

How can a cloudy lens affect my vision?

Age-related cloudy lens can affect your vision in two ways: Clumps of protein reduce the sharpness of the image reaching the retina. The lens consists mostly of water and protein. When the protein clumps up, it clouds the lens and reduces the light that reaches the retina. The clouding may become severe enough to cause blurred vision. Most age-related cloudy lens develops from protein clumpings. When a cloudy lens is small, the cloudiness affects only a small part of the lens. You may not notice any changes in your vision. Cloudy lens tend to "grow" slowly, so vision gets worse gradually. Over time, the cloudy area in the lens may get larger, and the cloudy lens may increase in size. Seeing the clear lens slowly changes to a yellowish/brownish color, adding a brownish tint to vision. As the clear lens slowly colors with age, your vision gradually may acquire a brownish shade. At first, the amount of tinting may be small and may not cause a vision problem. Over time, increased tinting may make it more difficult to read and perform other routine activities. This gradual change in the amount of tinting does not affect the sharpness of the image transmitted to the retina. If you have advanced lens discoloration, you may not be able to identify blues and purples. You may be wearing what you believe to be a pair of black socks, only to find out from friends that you are wearing purple socks.

What is the lens?

The lens is a clear part of the eye that helps to focus light, or an image, on the retina. The retina is the light-sensitive tissue at the back of the eye. In a normal eye, light passes through the transparent lens to the retina. Once it reaches the retina, light is changed into nerve signals that are sent to the brain. The lens must be clear for the retina to receive a sharp image. If the lens is cloudy from a cloudy lens, the image you see will be blurred.

What types of cloudy lenses are there?

Although most cloudy lens problems are related to aging, there are other types: **Secondary** — A cloudy lens can form after surgery from other eye problems, such as glaucoma. A cloudy lens can also develop in people who have other health problems, such as diabetes. A cloudy lens can sometimes be linked to steroid use. **Traumatic** — A cloudy lens can develop after an eye injury, sometimes years later. **Congenital** — Some babies are born with a cloudy lens or develop

When are you most likely to have a cloudy lens?

The term "age-related" is a little misleading. You do not have to be a senior citizen to get this type of cloudy lens. In fact, people can have an age-related cloudy lens in their 40s and 50s. But during middle age, most cloudy lenses are small and do not affect vision. It is after age 60 that most cloudy lenses steal vision.

What are the symptoms of a cloudy lens?

Blurry vision; Colors that seem faded; Glare; Headlights, lamps, or sunlight may appear too bright; A halo may appear around lights, double vision, not being able to see well at night; Frequent prescription changes in your eye wear. These symptoms also can be a sign of other eye problems. If you have any of these symptoms, check with your eye care professional. Cloudy lens usually develops slowly. New glasses, brighter lighting, anti-glare sunglasses or magnifying lenses can help at first. Surgery is also an option. It involves removing the cloudy lens and replacing it with an artificial lens. Congenital cloudy lens usually looks different than other forms of cloudy lens. Symptoms include: Infant doesn't seem to be able to see (if cloudy lens are in both eyes); Gray or white cloudiness of the pupil (which is normally black); "Red eye"; glow of the pupil is missing in photos, or is different between the two eyes; Unusual rapid eye movements (nystagmus).

How is a cloudy lens detected?

A cloudy lens is detected through a comprehensive eye exam that includes: **Visual acuity test** — This eye chart test measures how well you see at various distances. **Dilated eye exam** — Drops are placed in your eyes to widen, or dilate, the pupils. Your eye care professional uses a special magnifying lens to examine your retina and optic nerve for signs of damage and other eye problems. After the exam, your close-up vision may remain blurred for several hours. **Tonometry** — An instrument measures the pressure inside the eye. Numbing drops may be applied to your eye for this test.

How is a cloudy lens treated?

The symptoms of early cloudy lenses may be improved with new eyeglasses, brighter lighting, anti-glare sunglasses, or magnifying lenses. If these measures do not help, surgery is the only effective treatment. Surgery involves removing the cloudy lens and replacing it

with an artificial lens. A cloudy lens needs to be removed only when vision loss interferes with your everyday activities, such as driving, reading, or watching TV. You and your eye care professional can make this decision together. Once you understand the benefits and risks of surgery, you can make an informed decision about whether cloudy lens surgery is right for you. In most cases, delaying cloudy lens surgery will not cause long-term damage to your eye or make the surgery more difficult. You do not have to rush into surgery. Sometimes a cloudy lens should be removed even if it does not cause problems with your vision. For example, a cloudy lens should be removed if it prevents examination or treatment of another eye problem, such as age-related macular degeneration or diabetic retinopathy. If your eye care professional finds a cloudy lens, you may not need cloudy lens surgery for several years. In fact, you might never need cloudy lens surgery. By having your vision tested regularly, you and your eye care professional can discuss if and when you might need treatment. If you choose surgery, your eye care professional may refer you to a specialist to remove the cloudy lens. If you have cloudy lens in both eyes that require surgery, the surgery will be performed on each eye at separate times, usually four to eight weeks apart. Many people who need cloudy lens surgery also have other eye conditions, such as age-related macular degeneration or glaucoma. If you have other eye conditions in addition to cloudy lens, talk with your doctor. Learn about the risks, benefits, alternatives, and expected results of cloudy lens surgery.

How is a congenital cloudy lens treated?

If congenital cloudy lenses are mild and do not affect vision, they may not need to be treated, especially if they are in both eyes. Moderate to severe cloudy lenses that affect vision, or a cloudy lens that is in only one eye, will need to be treated with cloudy lens removal surgery. In most (noncongenital) cloudy lens surgeries, an artificial intracocular lens (IOL) is inserted into the eye. The use of IOLs in infants is controversial. Without an IOL, the infant will need to wear a contact lens. Patching to force the child to use the weaker eye is often needed to prevent amblyopia.

Is cloudy lens surgery effective?

Cloudy lens removal is one of the most common operations performed in the United States. It also is one of the safest and most effective types

of surgery. In about 90 percent of cases, people who have cloudy lens surgery have better vision afterward.

What are the risks of cloudy lens surgery?

Early diagnosis and treatment are key to preventing permanent vision problems. As with any surgery, cloudy lens surgery poses risks, such as infection and bleeding. Before cloudy lens surgery, your doctor may ask you to temporarily stop taking certain medications that increase the risk of bleeding during surgery. After surgery, you must keep your eye clean, wash your hands before touching your eye, and use the prescribed medications to help minimize the risk of infection. Serious infection can result in loss of vision. Cloudy lens surgery slightly increases your risk of retinal detachment. Other eye disorders, such as high myopia (near-sightedness), can further increase your risk of retinal detachment after cloudy lens surgery. One sign of a retinal detachment is a sudden increase in flashes or floaters. Floaters are little "cobwebs" or specks that seem to float about in your field of vision. If you notice a sudden increase in floaters or flashes, see an eye care professional immediately. A retinal detachment is a medical emergency. If necessary, go to an emergency service or hospital. Your eye must be examined by an eye surgeon as soon as possible. A retinal detachment causes no pain. Early treatment for retinal detachment often can prevent permanent loss of vision. The sooner you get treatment, the more likely you will regain good vision. Even if you are treated promptly, some vision may be lost. Talk to your eye care professional about these risks. Make sure cloudy lens surgery is right for you.

When to contact a medical professional

Call for an appointment with your health care provider if you have decreased night vision, problems with glare, or vision loss.

How can I prevent cloudy lenses?

The best prevention involves controlling diseases that increase the risk of a cloudy lens formation. Wearing sunglasses and a hat with a brim when you are outside during the day can reduce the amount of ultraviolet (UV) light your eyes are exposed to. Some sunglasses do not filter out the harmful UV. An optician should be able to tell you which sunglasses filter out the most UV. For patients who smoke cigarettes,

quitting will decrease the risk of cloudy lenses. Researchers also believe good nutrition can help reduce the risk of age-related cloudy lenses. They recommend eating green leafy vegetables, fruit, and other foods with antioxidants. If you are age 60 or older, you should have a comprehensive dilated eye exam at least once every two years. In addition to cloudy lens, your eye care professional can check for signs of age-related macular degeneration, glaucoma, and other vision disorders. Early treatment for many eye diseases may save your sight.

Summary

A cloudy lens is a clouding of the eye's lens and is the leading cause of blindness worldwide, and the leading cause of vision loss in the United States. Cloudy lens can occur at any age due to a variety of causes, and can be present at birth. Although treatment for the removal of a cloudy lens is widely available, access barriers such as insurance coverage, treatment costs, patient choice, or lack of awareness prevent many people from receiving the proper treatment. An estimated 20.5 million (17.2%) Americans 40 years and older have a cloudy lens in one or both eyes, and 6.1 million (5.1%) have had their lens removed operatively. The total number of people who have cloudy lenses is estimated to increase to 30.1 million by 2020.

Information was derived from the U.S. Government National Institutes of Health, the National Eye Institute and the Centers for Disease Control and Prevention.

20|20|20
RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

In developing countries, blindness is 500% more prevalent than in the U.S.



Millions of children and adults become blind every year and it can happen at any age.

Babies are born completely blind in both eyes.

Children who have perfect eyesight suddenly go blind in one eye or both.

Teenagers suffer injuries that cause them to go completely blind.

Parents become blind and lose their jobs, their income and their families.

Grandparents lose their eyesight and become a huge burden to their families.

All of them could have their eyesight restored — if someone helps them.

Millions who are waiting for surgery to restore their eyesight will never receive it unless someone helps them.

One million blind children could have their eyesight restored through a \$300 surgery.



You can be that someone.



20|20|20
RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

P.O. Box 966669, Washington, DC 20090-6669
20x20x20.org

20|20|20 is a 501(c)(3) nonprofit charitable organization recognized by the IRS.
All donations are tax deductible in accordance with IRS regulations. ©2013 20|20|20

They've invented a surgery that can cure blindness in 15 minutes.

It sounds unbelievable but it's true.

Half of all the blind children and adults in the world — that's 20 million people — could have their eyesight restored through a miracle surgery that takes 15 minutes and costs \$300.

It is a modern-day medical miracle.

The bad news is that even at \$300, most blind children and adults in developing countries could never afford this surgery.



20/20 is different than other charity programs.

We're focused on a single problem: helping the blind see.

Unlike most charities that try to solve many different problems, we're focused exclusively on just one. This helps us be more productive and cost-efficient. And it makes it easy for us to measure our progress and effectiveness. Our name says it all — our mission is to help restore 20/20 vision for 20 million blind children and adults.

We deliver results you can see and benefits that last a lifetime.

Unlike charities that are searching for a cure or that do things that you can't really see or appreciate, what we do is crystal clear. We provide miracle surgeries that in a matter of minutes can restore the eyesight of children and adults who are blind. Permanently.

So millions of blind children and adults — who are often referred to as the "needlessly blind" — will remain blind.

Forever.

Unless someone helps them.

That's why we started 20/20.

To restore 20/20 vision to 20 million blind children and adults!

To give them back not just their eyesight — but their future too.

But we can't do it without your help. Please help us restore the vision of a child or adult who is blind.

We give donors the maximum impact for every donation.

Every donor wants to know that their donation, whatever amount, actually makes a difference. What could be more impactful than restoring the eyesight of a child who is completely blind? And saving them from a lifetime of suffering, pain and heartache?

20/20 is managed like a business.

20/20 has a very experienced management team that takes great pride in the fact that it is held accountable for achieving specific goals and very ambitious results. We measure and monitor everything we do. Every program, every direct mail campaign, every dollar that we spend.

Extremely low overhead. Sky-high productivity.

Donors don't like charities that spend a lot on overhead and administration.

Neither do we.

We have a tiny staff working in a half-price sublet office that came with free furniture. All of our

technology — email, servers, networks — is in the "cloud" which saves millions of dollars.

20/20 is a WonderWork charity program.

This means we share office space, personnel, computers, etc. with other charity programs in order to dramatically reduce our overhead, administration and fundraising costs.



20/20 is a WonderWork charity program.

This means we share office space, personnel, computers, etc. with other charity programs in order to dramatically reduce our overhead, administration and fundraising costs.

Yes, I want to give the blind a chance to see...

- \$300 to provide a full surgery
 \$150 to provide half a surgery
 \$75 for anesthesia
 \$_____ Any amount will help



A \$300 donation
makes you a Founding Partner!

- Please send me updates about 20/20/20.
 I'd like to receive limited communications.
 Please do not ask me for another donation.

(Please allow 8 weeks to be removed from our mailing list.
Thanks for your patience as we process your request.)

If you prefer to charge your gift to a credit card, please check here and see other side.
Please make check payable to 20/20/20.

F134801106 NA13041016XXX00118

20|20|20

RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

One donation from you can restore the eyesight of a blind child or adult.

(And we'll never ask for another.)

Dear Friend,

Just think if you were born into a poor family, living in a mud hut, in one of the poorest countries in the world.

And you are completely blind. In both eyes. Since birth.



I recently met a 5-year-old boy who had been born into this horrific situation.

We met at a small hospital in rural Ethiopia where we were helping hundreds of children who needed free cleft surgery. As the co-founder and former CEO of Smile Train, my team and I helped 700,000 children undergo surgery they would otherwise never have received.

But there was nothing I could do to help this 5-year-old boy.

That broke my heart.

I watched him being led around by his friend and his future was as bleak as the look on his face. When I returned to the U.S., these pictures that I took really haunted me. So I did some research and what I learned was shocking.

There are 40 million blind children and adults in the world. Half of them could see tomorrow if they received a simple surgery that costs just \$300.

Yes, I know this sounds like it cannot possibly be true. But it is.

20 million children and adults are blind because they are too poor to afford a simple 15-minute surgery. So they remain blind. For life. They're called the "needlessly blind." What a wretched name.

My immediate reaction was, that's not a surgery — that is a miracle!

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WON-EX 9029

Visit our web site at 20x20x20.org to make a secure donation online.
Enclosed is my check payable to 20/20/20. If you prefer, we accept:
 MasterCard VISA American Express Discover

Card # _____ CVV# _____ Exp. Date ____ / ____

Signature _____

20/20/20 sometimes allows other worthy organizations to mail to our donors. If you do not wish to receive these mailings, or if you would like to change the frequency of mailings from us, let us know. We are happy to respect your wishes. 20/20/20 is a WonderWork charity program. WonderWork is a 501 (c) (3) nonprofit charitable organization recognized by the IRS. All donations are tax deductible in accordance with the law.

20|20|20

RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

P.O. Box 96669
Washington, DC 20090-6669

A 15-minute surgery that can restore the eyesight of someone who is completely blind is a modern-day, medical miracle.

So why haven't all of these blind children and adults been helped already?

This answer is also unbelievable. Today, in developing countries, 20 million children and adults remain blind *solely because they are too poor to afford the \$300 miracle surgery that could restore their eyesight.*

So they will remain blind. Forever.

Unless someone helps them.

You can be that someone.

That's why we created 20/20/20.

To restore the eyesight of 20 million children and adults.

To give each one of them back not just their vision — but their future.

And a 2nd chance at life that they never thought they'd get.

But we can't do it without your help.

We're a new charity program and we receive no money from the government or big foundations and corporations.

Every life-changing surgery we provide is paid for with donations from generous individuals like you.

YOU can make a miracle happen for a blind child or a blind adult.

YOU can save someone from a lifetime of blindness.

Will you please help us?

100% of your donation will go towards programs — 0% goes to overhead or fundraising.

The impact of even a modest donation can be enormous.

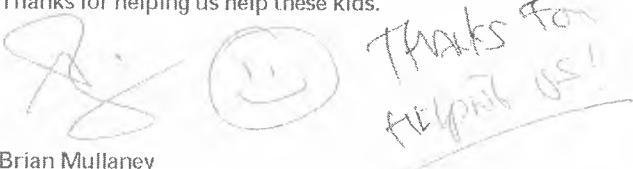
Imagine what you would pay to save your child from a lifetime of blindness.

Imagine what this surgery means to these children and their parents. It means the world — and it costs so little.

To thank you for helping us, I will send you a photo of a child you helped.

I promise those photos will open your eyes too.

Thanks for helping us help these kids.



Brian Mullaney
Co-Founder

P.S. Would you honor us by becoming a Founding Donor? All it takes is a \$300 donation. I'll send you a certificate of appreciation and when we're helping millions of blind children and adults a year, you'll be proud you helped us get started.

IWCG Job No: 2012549
Component: CF OSE

Project: WV FirstStep January Acquisition
Size: 11x8.5

Date: 12/04/12 Stage: FINAL

P.O. Box 96055, Washington, DC 20090-6055



Brian Mullaney
Co-Founder



Send us a donation to help a child
suffering with clubfoot and we'll
never ask you for another one!

WON-EX 9070

FirstStep
PO Box 96055
Washington, DC 20090 6055
Attention: Board

IWCG Job No: 2013080
Component: RAE

Project: WW FirstStep April Acquisition
Size: #9 Stock: white Ink: 1/1; FS 2727

Date: 03/15/13 Stage: FINAL

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What is clubfoot?

Clubfoot, also known as talipes equinovarus, is a congenital condition that causes one or both feet to be twisted inward and down. Approximately one out of every 750 children is born with clubfoot, making it one of the most common birth defects in the world. An estimated 90% of the cases can be found in developing nations.

An estimated 2,000,000 children live with untreated clubfoot. Almost half of all clubfoot cases are bilateral, which means that both feet are affected. Clubfoot is about twice as likely to occur in boys than in girls. When a child is born with clubfoot, the tendons in the leg and foot are shorter than normal. They pull the foot into an abnormal position, which results in bone deformity. This deformity is reversible with early treatment.

In a normal foot, the ankle is at a 90 degree angle, and the sole of the foot faces downward. In a person with clubfoot, the foot is turned down and inward, like the shape of a golf club. The severity of clubfoot ranges from mild to severe. In some severe cases, it may cause the foot to turn beside down. Clubfoot can affect both feet, known as bilateral or it may only affect one foot, known as unilateral.

How is clubfoot diagnosed?

Clubfoot is diagnosed with a simple physical exam. Sometimes doctors may do additional tests like X-rays. Clubfoot can sometimes be seen on ultrasound before birth. Even though it cannot be treated before the baby is born, this kind of early diagnosis can help parents prepare and plan for treatment. The earlier the treatment, the higher the chances are of success.

What is the cause of clubfoot?

The cause is not known, but the condition may be passed down through families in some cases. Genetic influences increase with family history, especially if one or more direct family members were born with clubfoot. Risk factors include:

- * Genetics - Boys are twice as likely as girls to be born with clubfoot.
- * Family history - If a parent or another child had clubfoot, the risk increases.
- * Clubfoot is not caused by something the mother did or did not do during pregnancy.

What is the treatment for clubfoot?

The Ponseti method, developed by Dr. Ignacio Ponseti, is a minimally invasive non-surgical treatment for clubfoot. The clubfoot is manipulated and placed in a series of casts to maintain the corrected position. In just 6 to 12 weeks, the process gradually straightens the bones, tendons, and muscles into proper alignment. This method is particularly suited for developing countries where there are a few orthopedic surgeons. The technique is easy to learn by health professionals, is very cost-effective, and is 95%+ effective.

Over the past decade, the Ponseti method has become the mainstream treatment for clubfoot, and is increasingly being used to help children with clubfoot in the developing world. Some severe cases of clubfoot will need surgery. If other treatments do not work, or if the problem returns, The child should be monitored by a health care provider until the foot is fully grown.

What is the Ponseti treatment for clubfoot?

The position placement and timing of the casts are deliberate and intentional to stretch and rotate the foot into a normal position. Over a series of weeks, the foot is manipulated and the casts are replaced in a process called serial casting. The casts are applied to maintain the corrected position of the foot in most cases. The manipulation and casting are sufficient to correct the clubfoot deformity. Additionally, a small procedure may be necessary to cut the tight Achilles tendon to allow the foot to assume its normal position. Once the casts are removed, the child will usually wear nighttime braces until about age five.

Does the Ponseti method always work?

The Ponseti method is almost always completely successful, with success rates over 95%. In some severe cases, surgery may be required to correct the position of the foot. Treatment may be required to correct the position of the clubfoot. Most often surgery is needed in cases where the child has other developmental problems, or if the child begins treatment later in life. The earlier treatment is completed, the higher the rate of success.

What should I do if I have a child with clubfoot?

Parents of infants born with clubfoot should be reassured that if their baby is treated using the Ponseti Method, this baby should have normal functioning feet with good mobility and function. Treatment should begin in the first week or two of life. If treated early on in life and treated properly, a baby that has no other complications should be able to lead a full, normal life, which includes playing sports.

What happens if the clubfoot relapses?

Clubfoot tends to relapse without proper care after the stretching and casting process. In order to prevent the foot from moving back to the incorrect position, the child must wear a brace.

Information about clubfoot

IWCA Job No: 2012R9/
Component: Information Insert

Project: IWCA FirstStep December Acquisition Date: 11/25/12 Stage: FINAL
Spec: 17555 Stock Write Inv: 171255

What if a clubfoot goes untreated?

If clubfoot is left untreated, it can lead to the inability to walk, infection and/or chronic pain. Can surgery cure a clubfoot? Surgery does not "cure" a clubfoot. It improves the appearance of the foot but strengthens the strength of the muscles in the foot and leg, decreasing stiffness and the surgical approach becomes painful at midline.

In addition, the recurrence of the deformity can occur even after surgery. Foot and ankle surgeons have reported that adult patients who were surgically treated for clubfoot in infancy have weak, stiff and often very painful feet.

If clubfoot repair surgery is needed, what is involved?

The type of surgery that is done depends on:

- How severe the clubfoot is
 - Your child's age
 - What other treatments your child has had

Your child will have general anesthesia (asleep and pain-free) during the surgery.

Ligaments are tissues that help hold the bones together in the body. Tendons are tissues that help attach muscles to bones. A clubfoot occurs when tight tendons and ligaments prevent the foot from stretching into the right position.

To repair a clubfoot, one or two cuts are made in the skin, most often on the back of the foot and around the inside part of the foot.

Why is the surgery performed?

A baby who is born with a clubfoot is first treated with a cast to stretch the foot into a more normal position.

Your child's surgeon

may make the foot turn around and the foot longer or shorter. The Achilles tendon at the back of the foot is almost always cut.

Older children or more severe cases may need some bone cut. Sometimes, pins are placed in the foot.

A cast is placed on the foot after surgery to keep it in position while it heals. Sometimes, a splint is put on first, and the cast is placed a few days later.

Often children who still have a lot of deformity after surgery may need more surgery. Also, children who have not had surgery yet may need surgery as they grow. Types of surgery they may need include:

- Osteotomy: Removing part of the bone
- Fusion or arthrodesis: Two or more bones are fused together. The surgeon uses bone from somewhere else in the body.
- Metal pins or plates may be used to hold the bones together for a while.

What happens after surgery?

Depending on the surgery that is done, your child may go home on the same day or stay in the hospital for 1 to 3 days right after the surgery. The hospital stay may be longer if surgery was also done on the bones. The child's foot should be kept in a raised position. Medicines may help control the pain.

A new cast will be placed every week so the foot can be stretched into position.

Cast changes continue for about 2 months. After casting, the child wears a brace for several years. Clubfoot repair surgery may be needed:

- The cast or other treatments do not fully correct the problem
- The problem comes back

Older children or adults may need surgery if:

- A clubfoot was never treated
- They still have foot problems after treatment

What are the risks of surgery?

Risks from any anesthesia are:

- Breathing problems
- Reactions to medicines

Risks from any surgery are:

- Bleeding
- Infection
- Possible problems from clubfoot surgery are:
 - Damage to nerves in the foot
 - Foot swelling
 - Problems with blood flow to the foot
 - Wound healing problems

What happens before clubfoot repair surgery?

Your child's doctor may

- Take a medical history of your child

**The skin around your child's cast will be checked often to make sure it stays pink and healthy. Your child's toes also will be checked to make sure they are pink and your child can move and feel them. These are signs of proper blood flow.**

Your child will have a cast on for 6 - 12 weeks. It may be changed several times before your child leaves the hospital, you will be taught how to take care of it's cast. When the last cast is taken off, your child's doctor will probably prescribe a brace, and may refer you to a therapist for physical therapy. The therapist will teach you exercises to do with your child to strengthen the foot and make sure it stays flexible.

What is the prognosis following surgery?

After recovering from surgery, your child's foot will be in a much better position. Your child should be able to have a normal active life, including playing sports. But the foot may be stiffer than a foot that has not been treated with surgery.

In most cases of clubfoot, if only one side is affected the child's foot and cast will be smaller than normal for the rest of the child's life. Children who have had clubfoot surgery may need another surgery later in life. FootSteps has provided the above materials for information purposes only. This information is not intended as a substitute for medical, medical advice. Please consult with your doctor or other medical professional about clubfoot and clubfoot treatment. Information was derived from Paediatric International Association, the U.S. Government National Institutes of Health and the World Health Organization.

The miracle cure for clubfoot costs \$250.

Instead of trying to cure clubfoot through surgery as was done for decades, the patient's feet are put into a series of casts. Each week, the patient comes back and a new cast is put on. Gradually, over six weeks, these casts straighten the feet just as braces are used to straighten crooked teeth.



After the feet are completely straightened, the child needs to wear braces, at night, to keep the feet from slipping out of alignment. The braces are no longer needed after a few years.

The end result — in 95% of the cases — are perfectly straight feet that will stay straight for the rest of the child's life. This miracle cure for clubfoot is by far the most effective, affordable and practical approach to fixing clubfoot in the world. The only problem is that because of extreme poverty, more than 2 million children in the developing world can't afford this cure — even though it costs just \$250.

Please help us save children who're suffering with clubfoot.

There's a miracle cure for clubfoot. It's safe, proven, effective 95% of the time and it costs just \$250. Imagine that, \$250 is all it takes to save a child from a lifetime of pain and suffering.

But millions of children who are poor will not be saved unless someone helps them.
You could be that someone.



You can help
a child walk
for the first time
in his life.



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IWCG Job No: 2012549
Component: Brochure

Project: WW FirstStep January Acquisition
Size: 11x8.5 Stock: White
Ink: 4CP

Date: 12/04/12 Stage: FINAL

WON-EX 9075

2 million children
with clubfoot are waiting
for a miracle cure
that costs just \$250.

For less than the cost of a pair of fancy shoes, you can save a child who is suffering with one of the worst birth defects in the world: clubfoot.
Clubfoot is when a baby is born with one or both feet severely deformed and twisted inward. It can be mild or severe. This painful, crippling condition can prevent children from ever being able to stand or walk.

Most children with clubfoot in the developing world are treated like social outcasts. They're not allowed to attend school, get a job, marry or raise a family. They have no hope, no future, no chance.
These children suffer their entire lives because they don't have \$250.

FirstStep was created to help the millions of children in developing countries who are suffering with clubfoot.

But we can't do it without your help.
With one donation,
one time, for one child,
you can provide a
miracle cure that will
change a child's
life forever.

FirstStep is a high-impact, low-overhead program.

WE EMPOWER LOCAL DOCTORS AND HOSPITALS IN DEVELOPING COUNTRIES.

Instead of sending



doctors on 2-week missions, FirstStep empowers local doctors through free training, equipment and crucial financial support. This is by far the smartest, most cost-effective and productive way to deliver care to poor children in developing countries. We're helping very poor but very proud communities become self-sufficient one patient at a time.

SERTING HIGH STANDARDS FOR PATIENT SAFETY AND QUALITY.

The safety of our patients is always our #1 priority. Our protocols and policies ensure our patients receive the best care possible. We audit results and provide free training for all of our partners.

HELPING PATIENT'S NO ONE ELSE WILL HELP.

We work in the poorest countries in the world. We tackle problems no one else will touch. We go to places other charities won't go. We help children who have been waiting for years, sometimes decades, for the miracle cure that can save them.



EXTREMELY LOW OVERHEAD AND ADMIN COSTS.



We are one of several WonderWork non-profit programs that are helping children suffering with major medical problems in the developing world. By sharing office space, personnel, equipment, furniture, etc. it will save us millions of dollars. Our staff is tiny.

Our rent is half what everyone else is paying and our offices came with free furniture. All of our email, file servers and even telephones are up in the cloud. This means much more of YOUR donation goes to what you want it to: helping children.

WERE A BRAND NEW PROGRAM — WITH 150+ YEARS OF EXPERIENCE.



Our senior managers have created and led some of the most well-known and successful surgical charities in the world. Some of them have been helping provide free surgeries for children in developing countries since the early 1980s.

Altogether we've already provided more than 1 million surgeries in 80 of the world's poorest countries. FirstStep is using all of that experience and talent to create the world's first major program that is focused on solving clubfoot. Helping children no one else will help. With a miracle cure that can give them back their future — and a second chance at life that they never thought they'd get.

Yes, I want to help a suffering child...

() \$300 to cure two children with clubfoot
() \$250 to cure one child with clubfoot
() \$125 to provide necessary medical supplies
() \$75 for follow-up treatments
() \$_____ Any amount will help

*ALL Donations \$250 AND ABOVE
MAKE YOU ONE OF our Founding Donors!*

- Please send me updates about FirstStep.
 I'd like to receive limited communications.
 Please do not ask me for another donation.
(Please allow 8 weeks to be removed from our mailing list.
Thanks for your patience as we process your request.)

If you prefer to choose your gift to a specific fund, please check here and see other funds. Please make check payable to FirstStep.

F149658145 CA13041720XXXD1803



Send us a donation to help
a child suffering with clubfoot
and we'll never ask you for another one!



Dear Friend,

Imagine if you were a 7-year-old girl who was born with clubfoot – one of the world's worst birth defects.

And you lived in one of the world's poorest countries. In a refugee camp. In a small hut made of sticks and a floor made of mud.

Not long ago, I met such a girl and it broke my heart.

It was 110 degrees at Dadaab, the world's largest refugee camp on the Somalian border and I was there working for a charity I co-founded called Smile Train. Over the past decade, as President of Smile Train, my team and I helped provide more than 700,000 free cleft surgeries for children.

But there was nothing we could do to help this girl because we only provided cleft surgeries.

I am sure this poor girl is still there today. Crawling because she can't walk. Crying because she can't go to school. Have any friends. And will never marry. Her life is over before it even began. The picture I took of her shows a child who has no future, no hope, no chance.

The saddest part of this story is that it could have a happy ending.

They've invented a cure for clubfoot.

It's more of a miracle than a cure. One that can straighten even the most twisted and deformed feet. Permanently.

The most amazing part is what it costs. Not tens of thousands of dollars. Not thousands of dollars. It costs just \$250. To save a desperate child from a lifetime of pain and suffering. Imagine how much you would pay to save your daughter if she was born with clubfoot.

Think how this girl would feel when she can stand up on her own two feet for the first time in her life.



Visit our web site at www.1stStep.org to make a secure donation online.
Enclosed is my check payable to FirstStep. If you prefer, we accept:

()MasterCard ()VISA ()American Express ()Discover

Card# _____ CVV# _____ Exp. Date ____ / ____

Signature _____

FirstStep sometimes allows other worthy organizations to mail to our donors. If you do not wish to receive these mailings or if you'd like to change the frequency of mailings from us, let us know. We are happy to respect your wishes. FirstStep is a WonderWork charity program. WonderWork is a 501 (c)(3) nonprofit, charitable organization recognized by the IRS. All donations are tax deductible in accordance with the law.



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When she can skip rope, make friends and go to school.

How much would this mean to her parents who are so worried about how their daughter will survive when they are gone.

There are more than 2,000,000 children in developing countries suffering with clubfoot. Most of them could be saved by a miracle cure that costs just \$250.

That's why we started FirstStep.

To give millions of children suffering with clubfoot the chance to stand up on their own two feet for the first time in their life.

To provide a miracle that can give a desperate child their future back — and a second chance at life that they never thought they'd get.

To help children no one else will help.

But we can't do anything without your help.

We receive no support from the government. Or large corporations. 99% of our funding comes from generous donors like you.

YOU can make a miracle happen for a child that desperately needs it.

YOU can save a child from a lifetime of heartache and suffering.

YOU can change a child's life with one donation, one gift, one time.

Please. Send us a donation of any amount and we will use it to change a child's life. To thank you, I will also send you a photo of a child we've helped.

Something you can put on your fridge — that will put a smile on your face.

Thank you for helping us,


Brian Mullany
Co-Founder
FirstStep



Thanks for helping us!



I met this boy in Bangkok, he is one of thousands of kids with club foot. I saw him the year.

P.S. It only takes one gift to help save a child from a lifetime of suffering. If you'd like this to be your only donation, check the box on the enclosed reply form and we'll honor your request.

P.P.S. A donation of \$250 or more will make you a Founding Donor of FirstStep.

WON-EX 9078

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BURN RESCUE

Life-changing surgeries for
severely burned children.

Brian Mullaney
Co-Founder



Send us a donation to help a
severely burned child and we'll
never ask you for another one!

WON-EX 9061

IWCG Job No: 2013080
Component: RAE

Project: WW BurnRescue April Acquisition
Size: #9 Stock: white Ink: 1/1; PMS 2727

Date: 03/15/13 Stage: FINAL

[REDACTED]

Anthony, Brian

2009-5C3A

Wesley, Jason
2009-5C3B
2009-5C3C

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Information About Burns and How to Prevent and Treat Them

BURN RESCUE

**Life-changing surgeries for
severely burned children**

Project: WWC Job Rec 20/2497 Component: Information Insert
Status: 17 Sec. Total to 3.250 Date: 11/05/12 Step: 1/1; Back

What is a burn?

A burn is damage to your body's tissues caused by heat, chemicals, electricity, sunlight or radiation. Scalds from hot liquids are steam, boiling liquids and flammable liquids and gases are the most common causes of burns.

What are the different types of burns?

1. First-degree (superficial) burns affect only the outer layer of skin. They cause pain, redness, and swelling.
2. Second-degree (partial thickness) burns affect both the outer and underlying layer of skin. They cause pain, redness, swelling and blistering.
3. Third-degree (full thickness) burns extend into deeper tissues. They cause white or blackened, charred skin that may be numb.

Burns can cause swelling, blisters, scarring and in serious cases, shock and even death. They also can lead to infections because they damage your skin's protective barrier. Antibiotic creams can prevent or treat infections. After a third-degree burn, you need skin or synthetic grafts to cover exposed tissue and encourage new skin to grow. First- and second-degree burns usually heal without grafts.

What are the most common causes of burns?

Burns can be caused by dry heat (like fire), wet heat (such as steam or hot liquids), radiation, friction, heated objects, the sun, electricity, or chemicals.

Thermal burns are the most common type. Thermal burns occur when hot liquids, steaming liquids, steam or flames come into contact with your skin. These are frequently the result of fires, automobile accidents, playing with matches, imp popularity (such as gasoline, space heaters, and electrical malfunctions). Other causes include unsafe handling of microwaves and kitchen accidents.

Burns to your airway can be caused by inhaling smoke, steam, superheated air, or toxic fumes.

What are the symptoms of burns?

These are the symptoms for thermal burns: blisters, pain, peeling skin, red skin, shock, swelling, white or charred skin. These are the symptoms of a dental burn: charred mouth, burned lips, burns on the head, face or neck, wheezing, change in voice, difficulty breathing, coughing, singed nose hairs or eyebrows, dark, carbon-stained mucus.

What are the issues to consider before treating burns?

Before giving first aid, evaluate how extensively burned the person is and try to determine the depth of the most serious part of the burn. Then treat the entire burn accordingly. If it could be treated as a severe burn.

By giving immediate first aid, you can help lessen the severity of the burn. Prompt medical attention to serious burns can help prevent scarring, disability, and deformity. Burns on the face, hands, feet, and genitalia can be particularly serious.

Children under age 5 and adults over age 60 have a higher chance of complications and death from severe burns. In case of a fire, you and other family members are at risk for carbon monoxide poisoning. Anyone with symptoms of headache, numbness, weakness, or chest pain should be tested.

How can burns be treated?

First Aid for Minor Burns

1. If the skin is unbroke, run cool water over the area of the burn or soak it in a cool water bath (not ice water). Keep the area submerged for at least 5 minutes. A clean, cold, wet towel will also help relieve pain.
2. Calm and reassure the person.
3. Make sure that the person is no longer in contact with smoldering material. However, do NOT remove burned clothing that is stuck to the skin.
4. Make sure the person is breathing. If breathing has stopped, or if the person's airways are blocked, open the airways. If necessary, begin rescue breathing and CPR.
5. Cover the burn area with a dry sterile bandage (if available) or clean cloth. A sheet will do if the burned area is large. Do NOT apply any ointments. Avoid breaking burn blisters.
6. If fingers or toes have been burned, separate them with dry, sterile, non-adhesive dressings.
7. Elevate the body part that is burned above the level of the heart. Protect the burn area from pressure and friction.

After flushing or soaking, cover the burn with a dry, sterile bandage or clean dressing.

Protect the burn from pressure and friction.

5. Over-the-counter ibuprofen or acetaminophen can help relieve pain and swelling. Do NOT give children under 12 aspirin. Once the skin has cooled, moisturizing lotion also can help.
6. Minor burns will usually heal without further treatment. However, if a second-degree burn covers an area more than 2 to 3 inches in diameter, or if it is located on the hands, feet, face, groin, buttocks, or a major joint, treat the burn as a major burn.
7. Make sure the person is up to date on tetanus immunization.

First Aid for Major Burns

1. If someone is on fire, tell the person to stop, drop, and roll. Wrap the person in thick material to smother the flames. (A coat or cotton coat, rug, or blanket). Douse the person with water.
2. Call 911.
3. Make sure that the person is no longer in contact with smoldering material. However, do NOT remove burned clothing that is stuck to the skin.
4. Make sure the person is breathing. If breathing has stopped, or if the person's airways are blocked, open the airways. If necessary, begin rescue breathing and CPR.
5. Cover the burn area with a dry sterile bandage (if available) or clean cloth. A sheet will do if the burned area is large. Do NOT apply any ointments. Avoid breaking burn blisters.
6. If fingers or toes have been burned, separate them with dry, sterile, non-adhesive dressings.
7. Elevate the body part that is burned above the level of the heart. Protect the burn area from pressure and friction.

Take steps to prevent shock. Lay the person flat, elevate the feet about 12 inches, and cover the person with a coat or blanket. However, do NOT place the person in this shock position if a head, neck, back, or leg injury is suspected or if it makes the person uncomfortable.

8. Continue to monitor the person's vital signs until medical help arrives. This means pulse, rate of breathing, and blood pressure.

When should I contact a medical professional?

- Call 911 if:
 - * The burn is extensive (the size of your palm or larger)
 - * The burn is severe (third degree)
 - * You aren't sure how serious it is
 - * The burn is caused by chemicals or electricity
 - * The person shows signs of shock
 - * The person inhales smoke.
 - * Physical abuse is known or suspected cause of the burn
 - * There are other symptoms associated with the burns
- Call a doctor if your pains still persist after 48 hours
- Call immediately if there are signs of infection (fever, top). These signs include increased pain, redness, swelling, drainage or pus from the burn, swollen lymph nodes, and streaks spreading from the burn, or fever.
- Also call immediately if there are signs of dehydration (heat, dry skin, chills, dizziness, light-headedness, or decreased urination). Children, elderly, and anyone with a weakened immune system (for example, HIV) should seek medical care right away.

Where are people treated for burns?

Over half of burn patients in the United States are treated in specialized burn centers, and most hospitals have trauma

teams that care exclusively for patients with traumatic injuries that may accompany burns.

What is a skin graft?

A skin graft is a patch of skin that is removed by surgery from one area of the body and transplanted to another area. This procedure may be necessary for a patient with burns depending on the severity and location of the burns. Your surgery will probably be done while you are under general anesthesia (you will be unconscious and will not feel pain). Burns will be sutured closed with sutures or staples. Your skin is taken from a place on your body called the donor site. Most people who are having a skin graft have a split-thickness skin graft. This takes the top layer of skin from the donor site (the epidermis) and the layer under the epidermis (the dermis). The doctor will clean any area of the body. Most times, it is an area that is hidden by clothes, such as the butck of inner thigh. The graft is carefully spread on the bare area where it is being transplanted. It is held in place either by gentle pressure from a well-padded dressing that covers it or by staples or a few small stitches. The donor-site area is covered with a sterile dressing for 3 to 5 days.

People with deep-tissue loss may need a full-thickness skin graft. This requires an entire thickness of skin from the donor site, not just the top two layers. A full-thickness skin graft is a more complicated procedure. The fat of skin from the donor site includes the muscles and blood supply. It is transplanted to the area of the graft. Common donor sites for full-thickness skin grafts include the chest wall, back, or abdominal wall.

What are things I should NOT do when treating burns?

- * Do NOT apply ointment, butter, ice, medications, cream, oil spray, or any household remedy to a severe burn.

Do NOT breath, blow, or cough on the burn

- * Do NOT disturb blisters or dead skin
- * Do NOT remove clothing that is stuck to the skin
- * Do NOT give the person anything by mouth, if there is a severe burn.
- * Do NOT immerse a severe burn in cold water. This can cause shock.
- * Do NOT place a pillow under the person's head if there is an airway burn. This can close the airways

The following list can help prevent burns

- * Remove electrical cords from floors and keep them out of reach.
- * Set temperature of water heater at 120 degrees or less to prevent scald burns from the faucet.
- * Keep all matches and lighters out of reach of children.
- * Store them up high, preferably in a locked cabinet.
- * Do not empty smoking ashes in a trash can, and keep ashtrays away from upholstered furniture and curtains.
- * Never place portable space heaters near flammable materials (such as, dryers).
- * Install smoke alarms in your home. Check and change batteries regularly.
- * Install a telephone at the entrance to your home.
- * Draw a floor plan and find two exits from each room.
- * Windows can serve as emergency exits.
- * Practice getting out of the house through the various exits.
- * Designate a meeting place at a safe distance outside the home.
- * Respond to every alarm as if it were a real fire.

More than one-third of Americans use fireplaces. Wood stoves and other fuel-fired appliances are major heat sources in their homes. Unfortunately, many people are unaware of the risks involved in heating with wood and solid fuels. Heating fires account for 36% of residential home fires in rural areas every year. Below are some tips for ensuring fire safety in the home:

Keep Fireplaces and Wood Stoves Clean

- * Have your chimney or wood stove inspected and cleaned annually by a certified chimney specialist.

Clear the area around the hearth of debris, decorations and flammable materials

- * Leave glass doors open while burning fire. Leaving the doors open ensures that the fire receives enough air to ensure complete combustion and keeps creosote from building up in the chimney.
- * Close glass doors when the fire is out to keep air from the chimney operating from getting into the room. Most glass fireplace doors have a metal mesh screen which should be closed when the glass doors are open. This mesh screen helps keep embers from getting out of the fireplace area.
- * Always use a metal mesh screen with fire places that do not have a glass fireplace door.
- * Install stoppers; thermometers, to help monitor flame temperatures.
- * Keep air inlets on wood stoves open, and never restrict air supply to fireplaces. Otherwise, you may cause a creosote buildup that could lead to a chimney fire.
- * Use fire-resistant materials on walls around wood stoves.

What are other things I can do around my house to prevent fires?

- * Soak hot ashes in water and place them in a metal container outside your home
- * What should I do if I am trapped in a burning building?
 - * Smoke rises; so crawl low to the ground where the air will be cleanest.
 - * Get out quickly if it is safe to leave. Cover your nose and mouth with a cloth (moist if possible).
 - * Test doors and spaces around doors with the back of your hand. If the door is warm, try another escape route. If it is cool, open slowly. Check to make sure your escape path is clear of fire and smoke.
 - * Use the stairs. Never use an elevator during a fire.
 - * Call the fire department for assistance if you are trapped. If you cannot get to a phone, yell for help out the window. Wave or hang a sheet or other long object to attract attention.
 - * Close as many doors as possible between your self and the fire. Seal all doors and vents between you and the fire with tape, towels, or sheets. Open windows slightly at the top and bottom, but close them if smoke comes in.

Deaths from fire and burns are the fifth most common cause of unintentional injury-related deaths in the United States. Although a working smoke alarm reduces the risk of death from residential fires by at least 50%, nearly about three-quarters of U.S. households reported having one. That functions.

BurnRescue is provided as above materials for information purposes only. Please consult with your doctor or other medical professional about burn prevention, causes and treatment.

The information is not intended as a substitute for professional medical advice.

Please consult with your doctor or other medical professional about burn prevention, causes and treatment.

Information was derived from the U.S. Government's National Institute of Health, the Centers for Disease Control and Prevention, and the Federal Emergency Management Agency.

The miracle surgery for burns.

It's simple. It takes just a few hours. And costs just \$500. That's all it takes to dramatically improve the life of a poor child who has been severely burned.

In developing countries, because of lack of care, much of the damage from severe burns happens AFTER the initial accident or injury. Often the burned skin fuses with other skin and then over time it contracts. This can cause all kinds of horrible things to happen. A child's chin can become fused with their chest. Fingers and toes can become fused together. Arms and legs can become fused. Anywhere burned skin comes in contact with other skin - it can become permanently fused which can cause crippling conditions that severely inhibit movement and motion. The consequences for a child are devastating. It is almost impossible to survive in a developing country if you can't walk, or use your arms and fingers, or if you have your chin glued to your chest.

Thankfully, there is a miracle surgery that can remedy this problem fairly quickly and inexpensively. The surgeon simply cuts through the fused sections of skin and "releases" the two areas. Skin grafts are used to cover the exposed areas. And though there is inevitable and unavoidable scarring, the improvement in movement and motion is life-changing for these children.

After surgery they can walk again. Use their fingers and arms. Lift their head up from their chest. This miracle surgery makes a profound difference in the quality of life for these children. In just a few hours, and for just a few hundred dollars, it can save them from a lifetime of pain and suffering. And give them a second chance at life that they never thought they'd get.

Please help us save a child who has been severely burned.

There's a miracle surgery that can save a child from a lifetime of pain and suffering.

It costs just \$500.

But millions of children who are poor will never receive it unless someone helps them.

You could be that someone.



Project#:

WW

BurnRescue

Acquisition

Stock:

White

Size:

11x8.5

Ink:

4CP

IWCG Job No: 2013016
Component: Brochure

Project#:

WW BurnRescue Acquisition

Stock:

White

Size:

11x8.5

Date: 01/09/13

Stage: FINAL

BURN RESCUE

Life-changing surgeries for
severely burned children.

P.O. Box 96054, Washington, DC 20090-6054
www.BurnRescue.org
Nonprofit charitable organization recognized by the IRS. All donations
are tax deductible in accordance with IRS regulations. ©2013 BurnRescue

BURN RESCUE

Life changing surgeries for

severely burned children.

BURN RESCUE

Life-changing surgeries for

severely burned children.

WON-EX 9066

15 million severely burned children are waiting for a miracle surgery that costs \$500.



It is one of the biggest medical problems in the developing world. Bigger than tuberculosis and HIV combined.

In the developing world, where billions still heat, light and cook with open fires, someone is horribly burned every five seconds.

Most burn victims die due to lack of acute care facilities. The "lucky" ones who live are often so deformed and disfigured, they face a lifetime of pain and suffering. A burn injury not only disfigures, it can destroy movement and function. It can prevent a child from walking. It can turn a hand into a closed fist. It can lose arms, fingers together forever.

The consequences are devastating. Most severely burned children are treated like social outcasts. They're not allowed to attend school, get a job or marry. Often they're kept hidden away in shame at home, a burden to their families. Their lives are over before they've begun. They have no hope, no future, no chance.

Children with severe burns suffer their entire lives because they can't afford a miracle surgery that costs just \$500.

BurnRescue was created to help the millions of children in developing countries who have been severely burned.

But we can't do it without your help. Please help us save a child from a lifetime of pain and suffering. One donation, one time, for one child, can provide a miracle surgery that will change a child's life forever.

BurnRescue is a well-managed, highly effective program.

WE EMPOWER LOCAL SURGEONS AND HOSPITALS IN DEVELOPING COUNTRIES.

Instead of sending doctors

on 2-week missions,

BurnRescue empowers local surgeons through free training, equipment and crucial financial support. This is by far the smartest, most cost-effective and productive way to deliver surgeons for poor children in developing countries. We're helping very poor but very proud communities become self-sufficient one patient at a time.



EXTREMELY LOW OVERHEAD AND ADMINISTRATIVE COSTS.

We are one of several

WonderWork charity programs that are helping children suffering with major medical problems in the developing world. By sharing office space, personnel, equipment, furniture, etc. it will save us millions of dollars. Our staff is tiny.

Our rent is half what everyone else is paying and our offices came with free furniture. All of our email, file servers and even telephones are up in the cloud. This means much more of YOUR donation goes to what you want it to: helping children.

SETTING HIGH STANDARDS FOR PATIENT SAFETY AND QUALITY.

The safety of our patients is always our #1 priority. Our protocols and policies ensure our patients receive the best care possible. We audit results and provide free training for all of our partners.

WE'RE A BRAND NEW PROGRAM — WITH 150+ YEARS OF EXPERIENCE.



HELPING PATIENT'S NO ONE ELSE WILL HELP.

We work in the poorest countries in the world. We tackle problems no one else will touch. We go to places other charities won't go. We help children who have been waiting for years, sometimes decades, for the miracle cure that can save them.



countries since the early 1980s. Altogether they've already provided almost 1 million surgeries in 80 of the world's poorest countries. BurnRescue is using all of that experience and talent to create the world's first major program that is focused on burns. Helping children no one else will help. With a miracle cure that can give them back their future — and a second chance at life that they never thought they'd get.

Yes, I want to help a suffering child...

() \$500 to provide a surgery
() \$250 supports hospital stay and medications
() \$125 to provide surgical supplies
() \$75 for follow-up treatments
() \$_____ Any amount will help

*All donations of \$250 and above
make you one of our funding donors!*

- Please send me updates about BurnRescue.
 I'd like to receive limited communications.
 Please do not ask me for another donation.
(Please allow 2 weeks to be removed from our mailing list.)
Thanks for your patience as we process your request!

If you prefer to charge your gift to a credit card, please check here and see other side. Please make check payable to BurnRescue.

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BURN RESCUE

Life-changing surgeries for severely burned children.

Send us a donation to help a severely burned child and we'll never ask you for another one!



Dear Friend,

Imagine you are an 8-year-old girl who accidentally fell into a fire.

You live in one of the world's poorest countries. In a refugee camp in a small hut made of sticks with a floor made of mud. And even though you survived 2nd and 3rd degree burns, they caused your chin to melt to your chest. Without surgery, your chin will be forever connected to your chest.

I recently met a girl who was horribly burned like this. It was 110 degrees at Dadaab, the world's largest refugee camp on the Somalian border and I was there working for a charity I co-founded called Smile Train. Over the past decade, as President of Smile Train, my team and I helped provide more than 700,000 free cleft surgeries for children.

But there was nothing we could do to help this girl. Because we only provided cleft surgeries.



I am sure this poor girl is still there today. With her skin fused together. Crying because she will never go to school. Have any friends. And will never marry. Her life is over before it even began. One horrible accident in a matter of seconds has left her with no future, no hope, no chance.

The saddest part of this story is that it could have a happy ending.

There's a surgery that can save children who've suffered horrific burns.

It's more of a miracle than a surgery. One that can separate skin that has fused together and give a burned child a second chance at life.

The most amazing part is what this miracle surgery costs. Not tens of thousands of dollars. Not thousands of dollars. It costs just \$500. To save a desperate child from a lifetime of pain and suffering. Imagine going through life with your chin attached to your chest. Imagine how much you would pay to save your daughter from this fate.

Think how much this would mean to this girl?



BurnRescue, P.O. Box 96054, Washington, DC 20090-6054 www.BurnRescue.org

WON-EX 9068

Visit our web site at www.BurnRescue.org to make a secure donation online.
Enclosed is my check payable to BurnRescue. If you prefer, we accept:

()MasterCard ()VISA ()American Express ()Discover

Card# _____ CVV# _____ Exp. Date ____ / ____

Signature _____

BurnRescue sometimes allows other worthy organizations to mail to our donors.
If you do not wish to receive these mailings or if you'd like to change the
frequency of mailings from us, let us know. We are happy to respect your
wishes. BurnRescue is a WonderWork charity program. WonderWork is a 501 (c)(3)
nonprofit, charitable organization recognized by the IRS. All donations are tax
deductible in accordance with the law.



Life-changing surgeries for
severely burned children.

P.O. Box 96054
Washington, DC 20090-6054

To regain the use of her fingers and arms.

To make friends and go to school.

To her parents who worry how their daughter will survive when they are gone.

In the developing world, where billions still heat, light and cook with open fires, burns are a massive problem. Bigger than tuberculosis and HIV combined. Bigger than breast cancer. Burns afflict an estimated 15,000,000 children. Millions of children die because of lack of acute care facilities. The "lucky" ones who live are often so deformed and disfigured, they face a lifetime of pain and suffering.

A burn injury not only disfigures, it can destroy movement and function. It can prevent a child from walking. It can turn a hand into a closed fist. It can fuse a chin to a chest forever.

The good news is that the vast majority of these kids could be saved by a miracle surgery that costs just \$500.

That's why we started BurnRescue.

To help 15 million children who are suffering with burns.

To provide a miracle surgery that can give desperate children their future back - and a second chance at life that they never thought they'd get.

To help children no one else will help.

But we can't do anything without your help.

We receive no support from the government. Or large corporations. 99% of our funding comes from generous donors like you.

YOU can make a miracle happen for a child that desperately needs it.

YOU can save a child from a lifetime of heartache and suffering.

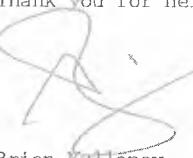
YOU can change a child's life with one donation, one gift, one time.

Please. Send us a donation of any amount and we will use it to change a child's life. To thank you, I will also send you a photo of a child we've helped.

Something you can put on your fridge - that will also put a smile on your face.

Thank you for helping us.




Brian Mullaney
Co-Founder
BurnRescue



Thanks for
helping us!

P.S. It only takes one gift to help save a child from a lifetime of suffering.
If you'd like this to be your only donation, check the box on the enclosed reply
form and we'll honor your request.

P.P.S. A donation of \$250 or more will make you a Founding Donor of BurnRescue.

WON-EX 9069

MULLANEY

EXHIBIT 10

DOING THE WORK
FOR A BETTER WORLD



— TIME
A TIME
OF CHANGING THE WORLD

August XX, 2016

Brian Mullaney
Co-Founder & CEO,
WonderWork

Steven D. Levitt
Author, *Freakonomics*

John (JJ) Conleys
Former Vice Chair, PwC

Ravi Kant
Former Vice Chair, Tata Motors

Clark Kokich
Executive Chairman, Marchex

Steven Rappaport
Partner, RJ Capital

Richard Steele
Principal, SYPPartners

Richard Price
Chief Executive, Asia Pacific,
CBRE Global Investors

Mark Atkinson
Creative Director, Otto

Tamsen Ann Ziff
Chairman, Metropolitan Opera

Kenneth French
Tuck School at Dartmouth

Garrett Moran
President, Year Up

—

Bryan Cranston
Actor

Christie Brinkley
Actor/Model

Howie Mandel
Comedian

Mariska Hargitay
Actor

Alex Trebek
Host of Jeopardy!

Bette Midler
Entertainer

Chris Meloni
Actor

Candice Bergen
Actor

Jane Kaczmarek
Actor

Sir Ben Kingsley
Actor

Dear SALUTATION,

It is 4:15pm, Thursday, June 30th – the final day of our 2016 fiscal year.

And my last chore is to write you this year-end thank you letter.

This year was our best year ever, and it would never have been possible without supporters like you. THANK YOU FOR HELPING US.

The past five years have had lots of ups and downs and more than a few surprises. At times, I wondered if maybe I was too old for another charity start-up. But today, as we pause to look back, I am so glad we stuck with it.

Today, in 44 of the poorest countries in the world, we have established 60 programs and partnerships.

Our partners range from small hospitals and clinics to large hospital networks and NGOs. Over the past 20 years of doing this work, we have learned that you can accomplish so much more when you partner with other like-minded people and organizations.

Over the past year, working with our partners – and with help from supporters like you – we helped provide 64,262 surgeries.

How many is that?

Imagine Gillette Stadium, where the New England Patriots play, with every seat filled with a smiling, happy patient. That's a lot of surgeries.

Calling them surgeries doesn't really do them justice.

They're actually modern-day, medical miracles that give crippled children the chance to walk and run. That re-build the faces of children who've been deformed by burns. And that give blind children and adults the chance to see again.

And they give folks like you and me, the very rare opportunity to save 64,262 children and adults no one else would help. Doesn't that feel good?

As a surgical charity, the number of surgeries we help provide every year is really our bottom line.

But it isn't all that we do.



EXHIBIT -10

Brian Mullaney

8/16/17

S. Arielle Santos, RPR, CSR
TransPerfect Legal

"A surgery that can change a child's life is one of the best investments anyone can make." — Warren Buffett

We're working on a capital project to build a burn hospital in the poorest region of India. This 225-bed hospital will provide more than 15,000 surgeries a year for the poorest of the poor. We're searching for land right now and hope to break ground in the fall, and it will take 2 years to build. Rafael Vinoly, one of the most famous architects in the world, (and also a donor) has generously agreed to help design our new hospital pro bono.

We expanded our Board of Directors by 6 new members, including the best-selling author of *Freakonomics* and genius U. Chicago professor, Steve Levitt. Our Medical Advisory Board expanded as well, as we improve our governance and our leadership.

Our viral videos continue to raise vital awareness and funds. To date, 14+ million people have watched our videos and thousands have sent us donations from more than 85 countries.

We're working with The Harvard School of Public Health and Boston Consulting Group to build a cloud-based, electronic medical record database to house all of our patient records. This will help us guard against fraud while also helping improve our quality and effectiveness.

We're doing all of this with a tiny staff of 9 people (and two interns) working out of a very small office in New York City.

We're very proud that our overhead and admin expenses are extremely low. Even better, one of our Founding Donors pays for all of our non-program expenses so that 100% of all donations – including yours – can go towards programs.

The last – and most important – thing I want you to know is how much we appreciate, and need, your support.

We're still a small charity that we started from scratch just five years ago. We get no money from the U.S. government or large grants from foundations or corporations. We depend entirely on donations from generous individuals like you.

I hope you stick with us because this next year we're going to need you more than ever. Our goal is to provide 130,000 surgeries – something no other surgical charity has ever done in one year.

With your help – I know we can do it. ☺



P.S. I am including an envelope so you can send us feedback on the following: Would you ever come to a dinner as our guest to hear about our programs and how we are using your donations? Would you ever want to travel to one of our partner hospitals in a developing country and meet some of the children whose lives you helped save? Are we mailing you too much? Do you have any ideas or suggestions for us? Do you know anyone else who might be able to help us? Any feedback greatly appreciated. THANK YOU!



FOR 20+ YEARS, I'VE TRAVELED TO MANY OF THE POOREST COUNTRIES IN THE WORLD.

I'VE WITNESSED EXTREME POVERTY, UNSPEAKABLE SUFFERING AND AMAZING ACTS OF SELFLESSNESS AND COMPASSION.

BUT THE MOST POWERFUL THING I'VE EVER SEEN... IS TO WATCH A BLIND CHILD OPEN THEIR EYES AND SEE FOR THE VERY FIRST

TIME.
THE SURGERY THAT RESTORES VISION IS A TRUE MODERN-DAY MEDICAL MIRACLE.

AND YOU HELP US DELIVER THIS MIRACLE TO HUNDREDS OF BLIND CHILDREN AND ADULTS EVERY SINGLE DAY.

THANK YOU,
BRIAN





THOUSANDS OF BLIND CHILDREN,
WOMEN AND MEN GROW UP AT
OUR FREE SURGERY
REGISTRATION CAMPS IN INDIA.



TWO SISTERS
BORN BOTH BLIND



TWO MORE SISTERS Born
BLIND SEE THEIR PARENTS
IN BACKGROUND PLANTING
RICE IN THEIR SMALL FIELD
THEY LIVE ON LESS THAN \$300/yr.



THREE MOTHERS IN SHOCK AND GRIEVE AFTER BEING TOLD
NOTHING CAN BE DONE TO RESCUE THE EYESIGHT OF THEIR
CHILD. DEVASTATING! THE LITTLE GIRL IN THE MIDDLE DID
UNDERGO SURGERY AND GOT SOME IMPROVEMENT, NOTHING
COULD BE DONE FOR THE OTHER TWO CHILDREN.



THIS GIRL WAS PULLED
FROM SCHOOL TO TAKE CARE
OF HER BLIND MOTHER. AFTER
SURGERY SHE WILL GO
BACK TO SCHOOL.



MINUTES AFTER OPENING
HER EYES AND SEEING HER
MOM FOR THE VERY FIRST
TIME, THIS 7-YEAR-OLD
EXPLODES HER
MOTHER'S FACE.



Attn: Brian
411 Fifth Avenue, Suite 702
New York, NY 10016



100% of all donations are used to fund our free surgery programs thanks to one of our Founding Donors who pays all administrative and fundraising expenses.

Whitewater Series for Children

WONDER
WORLD

100% of all donations
are used to fund our
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100% of all donations
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of our funding available
and pays all administrative
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November 16, 2016

«FULLNAME»
«Entity»
«AD1» «AD2»
«CITY», «ST» «ZIP»

Dear «SALUTATION»,

I cannot tell you how much we appreciate the very generous donation you recently sent us. Thank you very much for helping us.

This is the busiest time of year for our partner hospitals and they all have huge backlogs and waiting lists. We're scrambling to raise as much as we can so that our partners don't have to turn anyone away.

It has been a really tough year for us for fundraising – your donation will really make a difference.

I want you to know also that we will use 100% of your donation for our free surgery programs. One of our founding donors is very generously paying for all our rent, admin and salaries, so your donation will be used for what matters to you and to us: life-changing surgeries.

I am getting ready for a big trip to Bangladesh. I'm excited because we are taking a sea plane up a river to some very rural villages that are so remote, they cannot be reached by roads. We're going to visit one of our partners who operates a floating hospital that helps the poor. It should be quite an experience. I will send you some pictures and some stories when I get back.

Until then, please know how much we appreciate – and need – your support.

We're a tiny charity with 9 employees that is working hard this year to provide free surgeries for 100,000 poor kids and adults who are crippled with clubfoot, severely burned or blind.

And we could never do it without your help!

THANK YOU,

Brian
Co-Founder

P.S. If you have any suggestions, ideas or feedback for me, please do not hesitate to contact me directly: brian@wonderwork.org or 212-729-1855.

This is your tax receipt for your donation of «TRANAMT» received on «TRANDATE». WonderWork is a 501(c)(3) charity. No goods or services were provided in return for this donation.

"A surgery that can change a child's life is one of the best investments anyone can make." —Warren Buffett
WonderWork Supporter



"...one of 10 ideas that will change the world."
- TIME

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Dear Karen,

In spite of a really tough fundraising environment and all the challenges of running a small charity, we have a lot to be grateful for at WonderWork this Thanksgiving.

We're thankful that so far this year we've helped provide more than 68,000 surgeries for children and adults who could never afford them.

We're helping severely burned children rebuild their bodies and faces.

We're helping crippled children walk, stand and run for the first time.

We're helping restore the eyesight of tens of thousands of blind children and adults.

Most of them had waited many years for surgery.

We're thankful for our 61 partners which includes local hospitals and clinics in many of the poorest countries in the world.

From slums in India to refugee camps in Africa to rural villages in Nepal, hundreds of our partner surgeons, nurses and anesthesiologists are working 7 days a week operating on the poorest of the poor.

November 2, 2016



100% of all donations goes towards our free surgery programs.
A founding donor pays all admin and fundraising expenses.

415 Fifth Avenue, Suite 700, New York, NY 10016 T. 212.729.1855 WonderWork.org

This is DeLois in the Philippines
in 1986 on her very first surgical
mission. Since then, she has helped
provide more than 1 million surgeries.

We're thankful for the more than 200,000 donors and supporters who helped us get this charity started five years ago and continue to help us every day.

Without our donors and supporters, we could help no one.



We're very grateful for our small, but very talented and experienced staff. Believe it or not, we have just 9 employees.

DeLois Greenwood, our Chief Program Officer, has been helping provide surgeries for poor children since 1986.

I have never worked with a team that cared as much, worked as hard or got as much done day in and day out.

We're grateful for our Founding Donor who is paying all of our overhead, salaries and fundraising expenses so 100% of our donations can be used for our free surgery programs.



Finally, we are very thankful for *your* help and support.

I realize that you probably support a lot of very worthy causes.

But please know that none of them appreciate your support more than we do!

Happy Thanksgiving,

Brian
Co-Founder
212-729-1855
brian@wonderwork.org



P.S. I am including an envelope for any feedback, ideas, suggestions you might have for us! We would love to hear from you.



I am preparing for a trip to rural Bangladesh to visit a floating hospital boat that goes to very poor villages that can't be reached by car. I will send you some photos and stories. Until then, thank you so much for helping us.





Karen Lazarus
WonderWork
411 5th Ave
Ste 702
New York, NY 10016

100% of all donations goes
towards our free surgery programs.
A founding donor pays all admin
and fundraising expenses.

100% 2237



Attn: Brian
411 Fifth Avenue, Suite 702
New York, NY 10016

20120120_CFOE

There's a 15-minute surgery that
can restore the eyesight of children
who are completely blind.



Client/Job: WW_1305_20_AQNEW_CFOE
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Color: C M Y K

Stock:
Window Specs: N/A

M&B 1/2011

WON-EX 9333



P.O. Box 96669
Washington, DC 20090-6669

Send us a donation and we'll never ask for another!



Stock:
Window Specs: N/A

Client/Job: WW_1305_20_AQNEW_CFOE

Size: 9.5" x 4.125" (#10)

Color: C ■ M ■ Y ■ K ■

WON-EX 9334

20/20/20 RE-DROP 1

Re: Return Address

Attention: Brian

20/20/20
PO Box 96669
Washington, DC 20090-6669

MAILING ADDRESS

20/20/20 is a WorldwideWebs charity program. Your gift is very much appreciated and fully deductible as a charitable contribution. A copy of our latest financial report may be obtained by writing to WorldwideWebs, Inc., 420 Fifth Avenue, 27th Floor, New York, NY 10120, or calling toll-free, 1-800-445-7352 (800-HELP-F-A) within the state. REGISTRATION DOES NOT IMPLY ENDORSEMENT. FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL-FREE, 1-800-445-7352 (800-HELP-F-A) WITHIN THE STATE. REGISTRATION DOES NOT IMPLY ENDORSEMENT. APPROVAL, OR RECOMMENDATION BY THE STATE. FINALS REGISTRATION C-3659, GEORGIA - A full and fair description of our programs and our financial statement summary is available upon request at the office and phone number indicated above. 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NNE MARKETING

WON-EX 9335

In developing countries, blindness is 500% more prevalent than in the U.S.



Millions who are waiting for surgery to restore their eyesight will never receive it unless someone helps them.

You can be that someone.

Millions of children and adults become blind every year and it can happen at any age. Babies are born completely blind in both eyes. Children who have perfect eyesight suddenly go blind in one eye or both.

Teenagers suffer injuries that cause them to go completely blind. Parents become blind and lose their jobs, their income and their families.

Grandparents lose their eyesight and become a huge burden to their families.

All of them could have their eyesight restored — if someone helps them.

One million blind children could have their eyesight restored through a \$300 surgery.

20|20|20

RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

P.O. Box 966669
Washington, DC 20090-6669
20x20x20.org

20|20|20
RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

20/20/20 is a WonderWork charity program. WonderWork, Inc. is a 501(c)(3) nonprofit charitable organization recognized by the IRS. All donations are tax deductible in accordance with IRS regulations. © 2013 20/20/20

Client/Job: WW_1305_20_AQNEW_TR
size: 8.5" x 11"
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NNE
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Stock:
Special Instructions:

They've invented a surgery that can cure blindness in 15 minutes.

20/20/20 is different than other charity programs.

We're focused on a single problem: helping the blind see.

Unlike most charities that try to solve many different problems, we're focused exclusively on just one. This helps us be more productive and cost-efficient. And it makes it easy for us to measure our progress and effectiveness. Our name says it all — our mission is to help restore 20/20 vision for 20 million blind children and adults.

We deliver results you can see and benefits that last a lifetime.

Unlike charities that are searching for a cure or that do things that you can't really see or appreciate, what we do is crystal clear. We provide miracle surgeries that in a matter of minutes can restore the eyesight of children and adults who are blind. Permanently.

We give donors the opportunity to save a child's life.

Literally. The World Health Organization reports that in developing countries, 60% of children die within 1-2 years of going blind. Our miracle surgeries not only can give these children their eyesight back — but their future too.

We give donors the maximum impact for every donation.

Every donor wants to know that their donation,

It sounds unbelievable but it's true. Half of all the blind children and adults in the world — that's 20 million people — could have their eyesight restored through a miracle surgery that takes 15 minutes and costs \$300.

It is a modern-day medical miracle.

The bad news is that even at \$300, most blind children and adults in developing countries could never afford this surgery. So millions of blind children and adults — who are often referred to as the "needlessly blind" — will remain blind.

Forever.

Unless someone helps them.

That's why we started 20/20/20.

To restore 20/20 vision to 20 million blind children and adults!

To give them back not just their eyesight — but their future too.

But we can't do it without your help.

Please help us restore the vision of a child or adult who is blind.

whatever amount, actually makes a difference. What could be more impactful than restoring the eyesight of a child who is completely blind? And saving them from a lifetime of suffering, pain and heartache?

20/20/20 is managed like a business.

20/20/20 has a very experienced management team that takes great pride in the fact that it is held accountable for achieving specific goals and very ambitious results. We measure and monitor everything we do. Every program, every direct mail campaign, every dollar that we spend.

Extremely low overhead. Sky-high productivity.

Donors don't like charities that spend a lot on overhead and administration.

Neither do we.

We have a tiny staff working in a half-price sublet office that came with free furniture. All of our technology — email, servers, networks — is in the "cloud" which saves millions of dollars.

20/20/20 is a WonderWork charity program.

This means we share office space, personnel, computers, etc. with other charity programs in order to dramatically reduce our overhead, administration and fundraising costs.



Stock:
Special Instructions:



Client/Job: WW_1305_20_AQNEW_TRI
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Information About Cloudy Lenses and Your Vision

them in childhood, often in both eyes. These may not affect vision. If they do, the lenses may need to be removed. **Radiation** — A cloudy lens can develop after exposure to some types of radiation.

What are the causes of a cloudy lens?

The lens of the eye is normally clear. It acts like the lens on a camera, focusing light as it passes to the back of the eye. Until a person is around age 45, the shape of the lens is able to change. This allows the lens to focus on an object, whether it is close or far away. As we age, proteins in the lens begin to break down and the lens becomes cloudy. What the eye sees may appear blurry. This condition is known as a cloudy lens. Factors that may speed up cloudy lens formation are: Diabetes; Smoking; Eye inflammation; Eye injury; Family history of cloudy lens; Long-term use of corticosteroids (taken by mouth) or certain other medications; Radiation exposure; Surgery for another eye problem; Too much exposure to ultraviolet light (sunlight). In many cases, the cause of a cloudy lens is unknown.

What is a cloudy lens?

A cloudy lens affects vision and can cause blindness. Most cloudy lens problems are related to aging and very common in older people. By age 80, more than half of all Americans either have experienced a cloudy lens or have had surgery to correct cloudy lens. A cloudy lens can occur in either one or both eyes. It cannot spread from one eye to the other. A congenital cloudy lens is present at birth. The lens of the eye is normally clear. It focuses light that comes into the eye onto the retina. In most patients, no cause can be found.

What is the lens?

The lens is a clear part of the eye that helps to focus light, or an image, on the retina. The retina is the light-sensitive tissue at the back of the eye. In a normal eye, light passes through the transparent lens to the retina. Once it reaches the retina, light is changed into nerve signals that are sent to the brain. The lens must be clear for the retina to receive a sharp image. If the lens is cloudy from a cloudy lens, the image you see will be blurred.

What types of cloudy lenses are there?

Although most cloudy lens problems are related to aging, there are other types:

- Secondary** — A cloudy lens can form after surgery from other eye problems, such as glaucoma. A cloudy lens can also develop in people who have other health problems, such as diabetes. A cloudy lens can sometimes be linked to steroid use. **Traumatic** — A cloudy lens can develop after an eye injury, sometimes years later. **Congenital** — Some babies are born with a cloudy lens or develop

When are you most likely to have a cloudy lens?

The term "age-related" is a little misleading. You do not have to be a senior citizen to get this type of cloudy lens. In fact, people can have an age-related cloudy lens in their 40s and 50s. But during middle age, most cloudy lenses are small and do not affect vision. It is after age 60 that most cloudy lenses steal vision.

What are the symptoms of a cloudy lens?

Blurry vision; Colors that seem faded; **Glare;** Headlights, lamps, or sunlight may appear too bright; A halo may appear around lights; **double vision;** not being able to see well at night; frequent prescription changes in your eye wear. These symptoms also can be a sign of other eye problems. If you have any of these symptoms, check with your eye care professional. Cloudy lens usually develops slowly. New glasses, brighter lighting, anti-glare sunglasses or magnifying lenses can help at first. Surgery is also an option. It involves removing the cloudy lens and replacing it with an artificial lens. Congenital cloudy lens usually looks different than other forms of cloudy lens. Symptoms include: Infant doesn't seem to be able to see if cloudy lens are in both eyes; Gray or white cloudiness of the pupil (which is normally black); "Red eye" glow of the pupil is missing in photos, or is different between the two eyes; Unusual rapid eye movements (nystagmus).

How is a cloudy lens detected?

A cloudy lens is detected through a comprehensive eye exam that includes: **Visual acuity test** — This eye chart test measures how well you see at various distances. **Dilated eye exam** — Drops are placed in your eyes to widen, or dilate, the pupils. Your eye care professional uses a special magnifying lens to examine your retina and optic nerve for signs of damage and other eye problems. After the exam, your close-up vision may remain blurred for several hours. **Tonometry** — An instrument measures the pressure inside the eye. Numbing drops may be applied to your eye for this test.

How is a cloudy lens treated?

The symptoms of early cloudy lenses may be improved with new eyeglasses, brighter lighting, anti-glare sunglasses, or magnifying lenses. If these measures do not help, surgery is the only effective treatment. Surgery involves removing the cloudy lens and replacing it with an artificial lens. An instrument measures the pressure inside the eye. Numbing drops may be applied to your eye for this test.

with an artificial lens. A cloudy lens needs to be removed only when vision loss interferes with your everyday activities, such as driving, reading, or watching TV. You and your eye care professional can make this decision together. Once you understand the benefits and risks of surgery, you can make an informed decision about whether cloudy lens surgery is right for you. In most cases, delaying cloudy lens surgery will not cause long-term damage to your eye or make the surgery more difficult. You do not have to rush into surgery. Sometimes a cloudy lens should be removed even if it does not cause problems with your vision. For example, a cloudy lens should be removed if it prevents examination or treatment of another eye problem, such as age-related macular degeneration or diabetic retinopathy. If your eye care professional finds a cloudy lens, you may not need cloudy lens surgery for several years. In fact, you might never need cloudy lens surgery. By having your vision tested regularly, you and your eye care professional can discuss if and when you might need treatment. If you choose surgery, your eye care professional may refer you to a specialist to remove the cloudy lens. If you have cloudy lens in both eyes that require surgery, the surgery will be performed on each eye at separate times, usually four to eight weeks apart. Many people who need cloudy lenses surgery also have other eye conditions, such as age-related macular degeneration or glaucoma. If you have other eye conditions in addition to cloudy lens, talk with your doctor. Learn about the risks, benefits, alternatives, and expected results of cloudy lens surgery.

How is a congenital cloudy lens treated?

If congenital cloudy lenses are mild and do not affect vision, they may not need to be treated, especially if they are in both eyes. Moderate to severe cloudy lenses that affect vision, or a cloudy lens that is in only one eye, will need to be treated with cloudy lens removal surgery. In most (noncongenital) cloudy lens surgeries, an artificial intraocular lens (IOL) is inserted into the eye. The use of IOLs in infants is controversial. Without an IOL, the infant will need to wear a contact lens. Patching to force the child to use the weaker eye is often needed to prevent amblyopia.

Is cloudy lens surgery effective?

Cloudy lens removal is one of the most common operations performed in the United States. It also is one of the safest and most effective types

of surgery. In about 90 percent of cases, people who have cloudy lens surgery have better vision afterward.

What are the risks of cloudy lens surgery?

Early diagnosis and treatment are key to preventing permanent vision problems. As with any surgery, cloudy lens surgery poses risks, such as infection and bleeding. Before cloudy lens surgery, your doctor may ask you to temporarily stop taking certain medications that increase the risk of bleeding during surgery. After surgery, you must keep your eye clean, wash your hands before touching your eye, and use the prescribed medications to help minimize the risk of infection. Serious infection can result in loss of vision. Cloudy lens surgery slightly increases your risk of retinal detachment. Other eye disorders, such as high myopia (nearsightedness), can further increase your risk of retinal detachment after cloudy lens surgery. One sign of a retinal detachment is a sudden increase in flashes or floaters. Floaters are little "cobwebs" or specks that seem to float about in your field of vision. If you notice a sudden increase in floaters or flashes, see an eye care professional immediately. A retinal detachment is a medical emergency. If necessary, go to an emergency service or hospital. Your eye must be examined by an eye surgeon as soon as possible. A retinal detachment causes no pain. Early treatment for retinal detachment often can prevent permanent loss of vision. The sooner you get treatment, the more likely you will regain good vision. Even if you are treated promptly, some vision may be lost. Talk to your eye care professional about these risks. Make sure cloudy lens surgery is right for you.

When to contact a medical professional

Call for an appointment with your health care provider if you have:
Decreased night vision, problems with glare, or vision loss.

How can I prevent cloudy lenses?

The best prevention involves controlling diseases that increase the risk of a cloudy lens, and avoiding exposure to factors known to promote cloudy lens formation. Wearing sunglasses and a hat with a brim when you are outside during the day can reduce the amount of ultraviolet (UV) light your eyes are exposed to. Some sunglasses do not filter out the harmful UV. An optician should be able to tell you which sunglasses filter out the most UV. For patients who smoke cigarettes,

quitting will decrease the risk of cloudy lenses. Researchers also believe good nutrition can help reduce the risk of age-related cloudy lenses. They recommend eating green leafy vegetables, fruit, and other foods with antioxidants. If you are age 60 or older, you should have a comprehensive dilated eye exam at least once every two years. In addition to cloudy lens, your eye care professional can check for signs of age-related macular degeneration, glaucoma, and other vision disorders. Early treatment for many eye diseases may save your sight

Summary

A cloudy lens is a clouding of the eye's lens and is the leading cause of blindness worldwide, and the leading cause of vision loss in the United States. Cloudy lens can occur at any age due to a variety of causes, and can be present at birth. Although treatment for the removal of a cloudy lens is widely available, access barriers such as insurance coverage, treatment costs, patient choice, or lack of awareness prevent many people from receiving the proper treatment. An estimated 20.5 million (17.2%) Americans 40 years and older have a cloudy lens in one or both eyes, and 6.1 million (5.1%) have had their lens removed operatively. The total number of people who have cloudy lenses is estimated to increase to 30.1 million by 2020.

Information was derived from the U.S. Government National Institutes of Health, the National Eye Institute and the Centers for Disease Control and Prevention.

20|20|20

**RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS**

Yes, I want to give the blind a chance to see...

- \$300 to provide a full surgery
- \$150 to provide half a surgery
- \$75 for anesthesia
- \$_____ Any amount will help



- If you prefer to charge your gift to a credit card, please check here and see other side.

A \$300 donation makes you a Founding Power!

- Please send me updates about 20/20/20.
- I'd like to receive limited communications.
- Please do not ask me for another donation.

(Please allow 8 weeks to be removed from our mailing list.
Thanks for your patience as we process your request.)

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20|20|20

RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

One donation from you can restore the eyesight of a blind child or adult.

(And we'll never ask for another.)

Dear Ms. [REDACTED]

Just think if you were born into a poor family, living in a mud hut, in one of the poorest countries in the world.

And you are completely blind. In both eyes. Since birth.

I recently met a 5-year-old boy who had been born into this horrific situation.

We met at a small hospital in rural Ethiopia where we were helping hundreds of children who needed free cleft surgery. As the co-founder and former CEO of Smile Train, my team and I helped 700,000 children undergo surgery they would otherwise never have received.

But there was nothing I could do to help this 5-year-old boy.

That broke my heart.

I watched him being led around by his friend and his future was as bleak as the look on his face. When I returned to the U.S., the pictures that I took really haunted me. So I did some research and what I learned was shocking.

There are 40 million blind children and adults in the world. Half of them could see tomorrow if they received a simple surgery that costs just \$300.

Yes, I know this sounds like it cannot possibly be true. But it is.

20 million children and adults are blind because they are too poor to afford a simple 15-minute surgery. So they remain blind. For life. They're called the "needlessly blind." What a wretched name.

My second reaction was, that's not a surgery — that is a miracle!

A 15-minute surgery that can restore the eyesight of someone who is completely blind is a modern-day, medical miracle.

So why haven't all of these blind children and adults been helped already?

This answer is also unbelievable. Today, in developing countries, 20 million children and adults remain blind solely because they are too poor to afford the \$300 miracle surgery that could restore their eyesight.

So they will remain blind. Forever.

Unless someone helps them.

You can be that someone.

That's why we created 20/20/20.

To restore the eyesight of 20 million children and adults.

To give each one of them back not just their vision — but their future.

And a 2nd chance at life that they never thought they'd get. But we can't do it without your help.

Visit our web site at 20x20x20.org to make a secure donation online.

Enclosed is my check payable to 20/20/20. If you prefer, we accept:

() MasterCard () VISA () American Express () Discover

Card # _____ CVV# _____ Exp. Date _____

Signature _____

20/20/20 sometimes allows other worthy organizations to mail to our donors. If you do not wish to receive these mailings, or if you would like to change the frequency of mailings from us, let us know. We are happy to respect your wishes. 20/20/20 is a WonderWork charity program. WonderWork is a 501 (c) (3) nonprofit charitable organization recognized by the IRS. All donations are tax deductible in accordance with the law.

20|20|20
RESTORING THE EYESIGHT OF
20 MILLION BLIND
CHILDREN AND ADULTS

P.O. Box 96669
Washington, DC 20090-6669
20x20x20.org

We're a new charity program and we receive no money from the government or big foundations and corporations.

Every life-changing surgery we provide is paid for with donations from generous individuals like you.

YOU can make a miracle happen for a blind child or a blind adult.

YOU can save someone from a lifetime of blindness.

Will you please help us?

100% of your donation will go towards programs — 0% goes to overhead or fundraising.

The impact of even a modest donation can be enormous.

Imagine what you would pay to save your child from a lifetime of blindness.

Imagine what this surgery means to these children and their parents. It means the world — and it costs so little.

To thank you for helping us, I will send you a photo of a child you helped.

I promise those photos will open your eyes too.

Thanks for helping us help these kids.



THANKS FOR
HELPING US!

Brian Mullaney
Co-Founder

P.S. Would you honor us by becoming a Founding Donor? All it takes is a \$300 donation. I'll send you a certificate of appreciation and when we're helping millions of blind children and adults a year, you'll be proud you helped us get started.

P.P.S. 20/20/20 is a WonderWork charity program, which means we share our office space, personnel and computers with other charity programs to keep our overhead expenses very, very low.